

**LOWELL DECL. EX. 11**

July 29, 2021

UNITED STATES DISTRICT  
SOUTHERN DISTRICT OF NEW YORK  
Case No. 18-Civ. 12355

-----x  
SHABTAI SCOTT SHATSKY, individually  
and as personal representative of the  
Estate of Keren Shatsky, J ANNE  
SHATSKY, individually and as personal  
representative of the Estate of Keren  
Shatsky, TZIPPORA SHATSKY SCHWARZ,  
YOSEPH SHATSKY, SARA SHATSKY TZIMMERMAN,  
MIRIAM SHATSKY, DAVID RAPHAEL SHATSKY,  
GINETTE LANDO THALER, individually and  
as personal representative of the  
Estate of Rachel Thaler, LEOR THALER,  
ZVI THALER, ISAAC THALER, HILLEL  
TRATTNER, RONIT TRATTNER, ARON S.  
TRATTNER, SHELLEY TRATTNER, EFRAT  
TRATTNER, HADASSA DINER, Yael  
HILLMAN, STEVEN BRAUN, CHANA  
FRIEDMAN, ILAN FRIEDMAN, MIRIAM  
FRIEDMAN, YEHIEL FRIEDMAN, ZVI  
FRIEDMAN, and BELLA FRIEDMAN,

Plaintiffs,

- against -

THE PALESTINE LIBERATION ORGANIZATION  
and THE PALESTINE AUTHORITY(a/k/a "The  
Palestinian Interim Self-Government  
Authority" and/or "The Palestinian  
National Authority"),  
Defendants.

-----x

Videotaped Deposition of 30(b)(6)

Witness, FARID GHANNAM, (with all parties  
participating remotely), on Thursday,  
July 29, 2021, commencing at 7:33 a.m.,  
before Roberta Caiola, a Professional Court  
Reporter and a Notary Public.

July 29, 2021

## A P P E A R A N C E S:

For the Plaintiffs:

ESZTER VINCZE, ESQ.

MELISSA MAXMAN, ESQ.

RONALD F. WICK, ESQ.

(Admitted Pro Hac Vice)

COHEN &amp; GRESSER, LLP

2001 Pennsylvania Avenue, NW

Suite 300

Washington, DC 20006

mmaxman@cohengresser.com

evincze@cohengresser.com

STEPHEN M. SINAIKO, ESQ.

COHEN &amp; GRESSER, LLP

800 Third Avenue

New York, NY 10022

For the Defendants:

MITCHELL R. BERGER, ESQ.

GASSAN A. BALOUL, ESQ.

JOSEPH ALONZO, ESQ.

SALIM KADDOURA, ESQ.

SQUIRE PATTON BOGGS

2550 M Street NW

Washington, DC 20037

gassan.baloul@squirepb.com

mitchell.berger@squirepb.com

joseph.alonzo@squirepb.com

Also Present:

Mordechai Haller

Simek Shropshire, Paralegal

Cohen &amp; Gresser

Arabic-Hadeer Al Amiri, The Interpreter

Corey Wainaina, The Videographer

July 29, 2021

## INDEX

EXAMINATION OF FARID GHANNAM	PAGE
FARID GHANNAM BY MS. VINCZE	7

## E X H I B I T S

EXHIBITS	DESCRIPTION	PAGE
Exhibit 1	30(b)(6) Notice dated June 16, 2021	24
Exhibit 2	Document Bates stamped Shatsky-JD00012 through Shatsky-JD00249	45
Exhibit 3	Document Bates stamped Shatsky-JD00113 through Shatsky-JD00117	61
Exhibit 4	Document Bates stamped Shatsky-JD00977 through Shatsky-JD00990	74

July 29, 2021

1 Farid Ghannam

2 THE VIDEOGRAPHER: Good

3 morning, everyone. We are now on the  
4 record. Participants should be aware  
5 that this proceeding is being  
6 recorded and, as such, all  
7 conversations held will be recorded,  
8 unless there is a request and  
9 agreement to go off the record.

10 This is the remote video  
11 recorded deposition of Farid Ghannam.  
12 Today is Thursday, July 29, 2021.  
13 The time is now 11:32 UTC time. We  
14 are here in the matter of Shatsky  
15 versus PLO.

16 My name is Corey Wainaina,  
17 remote video technician on behalf of  
18 U.S. Legal Support, located at 90  
19 Broad Street, New York, New York. I  
20 am not related to any party in this  
21 action, nor am I financially  
22 interested in the outcome. At this  
23 time, will the reporter, Roberta  
24 Caiola, on behalf of U.S. Legal  
25 Support, please enter the statement

July 29, 2021

1 Farid Ghannam  
2 for remote proceedings into the  
3 record.

4 THE COURT REPORTER: The  
5 attorneys participating in this  
6 deposition acknowledge that I am not  
7 physically present in the deposition  
8 room and that I will be reporting  
9 this deposition remotely.

10 They further acknowledge that,  
11 in lieu of an oath administered in  
12 person, I will administer the oath  
13 remotely, pursuant to executive order  
14 number 202.7 issued by Governor Cuomo  
15 on March 19, 2020.

16 The parties and their counsel  
17 consent to this arrangement and waive  
18 any objections to this manner of  
19 reporting. Please indicate your  
20 agreement by stating your name and  
21 your agreement on the record.

22 MS. VINCZE: Eszter Vincze for  
23 Cohen & Gresser. We represent  
24 plaintiffs. We agree.

25 MR. BERGER: This is Mitchell

July 29, 2021

1 Farid Ghannam

2 Berger, Squire Patton Boggs on behalf

3 of defendants, and we agree.

4 ARABIC-HADEER AL AMIRI, called as the

5 official interpreter, having been duly

6 sworn (by Roberta Caiola) to translate

7 questions from English to Arabic and

8 answers from Arabic to English, translated

9 as follows:

10 FARID GHANNAM, called as a witness, having

11 been duly sworn (through the interpreter)

12 by a Notary Public of the State of New

13 York, testified as follows:

14 MS. VINCZE: Before we begin

15 with Mr. Ghannam, just one

16 housekeeping measure. Since we are

17 here remotely during the COVID-19

18 pandemic, we would ask that

19 defendants confirm that, pursuant to

20 Rule 30(b)(4) of the Federal Rules of

21 Civil Procedure, that today's

22 deposition may be taken by video

23 conference as we're proceeding.

24 Pursuant to Rule 29, the

25 parties also stipulate that

July 29, 2021

1 Farid Ghannam

2 Ms. Caiola is an appropriate officer  
3 before whom this deposition may be  
4 taken, even though the witness is in  
5 Jordan and Ms. Caiola is located in  
6 New York. Do we agree?

7 MR. BERGER: This is Mitchell  
8 Berger on behalf of defendants. We  
9 agree.

10 MS. VINCZE: Thank you.

11 EXAMINATION

12 BY MS. VINCZE:

13 Q. Good morning, Mr. Ghannam.  
14 Thank you for coming here today. My name  
15 is Eszter Vincze. I'm here representing  
16 plaintiffs in this case and I will be  
17 asking you some questions today and  
18 tomorrow. Before I do so -- pardon?

19 (Pause in proceedings.)

20 -- I just want to go through  
21 some ground rules so that you know what to  
22 expect today.

23 Please state your name and  
24 address for the record.

25 A. My name is Farid Ahmed Abed



July 29, 2021

1 Farid Ghannam

2 Hafez Ghannam. I live in Palestine,  
3 Ramallah.

4 Q. What is your occupation and  
5 title?

6 A. My occupation is the Deputy of  
7 the Minister of Finance, and my title is  
8 Al.

9 Q. Have you ever had your  
10 deposition taken before?

11 A. No.

12 Q. So I'm going to go over the  
13 process with you, so that we're all on the  
14 same page. Is that all right?

15 A. Yes.

16 Q. Do you understand that you are  
17 testifying under oath?

18 A. Yes.

19 Q. The court reporter will be  
20 transcribing everything we say today. To  
21 make sure that the record is accurate, and  
22 especially since this deposition is taking  
23 place via remotely, in light of the  
24 COVID-19 pandemic, it is important that we  
25 do not speak over each other, so that only

July 29, 2021

1 Farid Ghannam

2 one person speaks at a time.

3 Please wait until I finish my  
4 questions before you start answering them,  
5 and I will wait until you finish your  
6 answer before I ask another question. Is  
7 that understood?

8 A. Yes.

9 Q. It is also important for you to  
10 respond to questions verbally. For  
11 example, nodding your head can't be  
12 transcribed.

13 A. Yes.

14 Q. If you do not understand a  
15 question, please let me know. I will try  
16 to rephrase it for you. But, if you answer  
17 a question, I will assume that you  
18 understood my question. Okay?

19 A. Yes.

20 Q. Thank you. Now, your counsel  
21 may object to my questions, but unless your  
22 counsel instructs you not to answer a  
23 question, you should go ahead and answer my  
24 question, even though there was an  
25 objection. Is that understood?

July 29, 2021

1 Farid Ghannam

2 A. Yes.

3 Q. I may take periodic breaks  
4 during the deposition. If you need a  
5 break, please let me or your attorney know,  
6 and I will do my best to accommodate your  
7 request. However, if a question is  
8 pending, I ask that you answer the question  
9 first before we take a break. All right?

10 MR. BERGER: By counsel, before  
11 he answers that, and consistent with  
12 the local rules, he's going to say  
13 yes for that, save for the exception  
14 of any break we need to take to  
15 confer over potential questions of  
16 privilege before he answers. You may  
17 answer.

18 Q. Do you remember the question,  
19 Mr. Ghannam?

20 A. Yes.

21 Q. And, did you understand what I  
22 had to say about breaks?

23 A. Yes.

24 Q. We're going to show you a lot  
25 of documents today. If at any time you

July 29, 2021

1 Farid Ghannam

2 need to see more of the document than is on  
3 the screen, then please let me know and we  
4 will try to accommodate that. Okay?

5 A. Yes.

6 Q. Mr. Ghannam, do you speak  
7 English?

8 A. I don't master English  
9 speaking.

10 Q. Do you speak some degree of  
11 English?

12 A. I cannot speak or express  
13 myself in the English language.

14 Q. Do you understand English?

15 A. I don't speak the English  
16 language well.

17 Q. Is there any reason you can't  
18 testify truthfully today?

19 A. There is no reasons.

20 Q. Is there any reason you can  
21 think of as to why you would not be able to  
22 answer my questions today fully and  
23 accurately?

24 A. There is no reasons.

25 Q. Now, when I ask you questions,

July 29, 2021

1 Farid Ghannam

2 I will be using shorthand for some terms.

3 For example, when I refer at times to

4 "defendants," I mean both the Palestinian

5 Authority and the Palestine Liberation

6 Organization. Do you understand?

7 A. Yes.

8 Q. And I will be referring to the

9 Palestinian Authority as the PA sometimes.

10 Do you understand that?

11 A. Yes.

12 Q. And I will be referring to the

13 Palestinian Liberation Organization as the

14 PLO sometimes. Do you understand that?

15 A. Yes.

16 Q. Thank you. Let's briefly

17 review your educational background. What

18 is your highest level of education?

19 A. The highest level of education

20 that I obtained is a master's degree in

21 financial science and banking, and now I'm

22 studying the Ph.D.

23 Q. And where did you receive that

24 master's degree?

25 A. In the Islamic University in

July 29, 2021

1 Farid Ghannam

2 Gaza.

3 Q. Where are you studying for your  
4 Ph.D.?

5 A. Can you repeat the question?

6 THE INTERPRETER: This is the  
7 interpreter. I will repeat the  
8 question.

9 Q. Where are you studying for your  
10 Ph.D.?

11 A. I registered in Morocco, in  
12 Mohamed Al Khamis Universiti.

13 Q. Do you have any licenses, any  
14 professional licenses?

15 A. Yes.

16 Q. What are those licenses?

17 A. A license in the financial  
18 sciences and banking. Also, a license to  
19 teach in the science, financial science in  
20 the university.

21 Q. And do you teach at the  
22 financial -- at the university?

23 A. I taught in Birzeit University  
24 for four years, the financial science and  
25 banking.

July 29, 2021

1 Farid Ghannam

2 MR. BALOUL: This is an  
3 objection to the translation. It's  
4 not banking. It's accounting.

5 THE INTERPRETER: Accounting.

6 Q. What courses did you teach?

7 A. It's general financing.

8 Q. Do you have a bachelor's  
9 degree?

10 A. Yes.

11 Q. Where is your bachelor's degree  
12 from?

13 A. From Alexandria University from  
14 Egypt.

15 Q. And when did you obtain that  
16 bachelor's degree?

17 A. 1983.

18 Q. And when did you begin your  
19 master's program?

20 A. I started studying for the  
21 master's degree in 2002.

22 Q. And when did you obtain your  
23 master's degree?

24 A. In 2006.

25 Q. Do you have any professional

July 29, 2021

1 Farid Ghannam

2 certifications?

3 A. Other than the certificate  
4 concerning the financial sciences and  
5 accounting, I don't have any other  
6 certificates.

7 Q. You have been designated to  
8 testify on behalf of both the PA and the  
9 PLO, correct?

10 A. Yes.

11 Q. Do you have a formal position  
12 within the PA?

13 A. Deputy of the Finance, Minister  
14 of Finance.

15 Q. Do you hold any other titles  
16 within the PA?

17 A. I'm a member in multiple  
18 organizations in the Palestinian Authority.

19 Q. What are those organizations?

20 THE INTERPRETER: This is the  
21 interpreter. I'm going to ask the  
22 respondent to say them one by one.

23 A. The Alliance for Industrial  
24 Cities.

25 (Court reporter clarification.)



July 29, 2021

1 Farid Ghannam

2 THE INTERPRETER: The Affairs  
3 of Industrial Cities.

4 A. The Affairs of the Water  
5 Authority. The Employment Palestinian  
6 Authority.

7 Q. Is that -- are there any other  
8 organizations of which you are a member  
9 within the PA?

10 THE INTERPRETER: So this is  
11 interpreter.

12 (Clarifying.)

13 A. The Finance Palestinian  
14 Authority.

15 Q. Are there any other  
16 organizations, besides the ones that you  
17 have listed within the PA, of which you are  
18 a member?

19 A. No.

20 Q. What do you do for the Alliance  
21 for the Affairs of Industrial Cities?

22 A. I work as a member of the  
23 regulatory committee in this institute.

24 Q. And what do you do for the  
25 Affairs of the Water Authority?

July 29, 2021

1 Farid Ghannam

2 A. The same function. A member in  
3 the...

4 Q. A member in the what?

5 A. The same function. A member in  
6 the organization's affair.

7 MS. VINCZE: This is a question  
8 for the interpreter. Did he -- did  
9 he say -- can you repeat what he said  
10 to me again, please?

11 THE INTERPRETER: Yes, ma'am.

12 It's the same function. It's a  
13 member in the organization affairs.

14 Q. What do you do in the  
15 employment PA?

16 A. I work as a member in the  
17 organization's committee.

18 Q. And what do you do for the  
19 finance PA?

20 A. I'm a member in the  
21 organization's committee.

22 Q. What is the Alliance of the  
23 Affairs of Industrial Cities?

24 A. I work in the industrial cities  
25 as a member.

July 29, 2021

1 Farid Ghannam

2 Q. Yes, but what is the  
3 organization?

4 A. This is a committee to  
5 encourage the industrial sector and put it  
6 in a position to have privilege, financial  
7 privileges.

8 Q. And what is the Water  
9 Authority?

10 A. It organizes the function of  
11 water in Palestine.

12 Q. And what is the Employment  
13 Authority?

14 A. It regulates the Palestine  
15 employment, whether inside or outside.

16 Q. And what is the Finance  
17 Authority?

18 A. It's a substitute for the Satal  
19 (phonetic) Palestinian Bank.

20 Q. And how does that organization  
21 relate to the Ministry of Finance?

22 A. It has a strong relationship to  
23 the Ministry of Finance.

24 Q. Is it separate from the  
25 Ministry of Finance?

July 29, 2021

1 Farid Ghannam

2 A. The Finance Authority is the  
3 one that is separate from the Ministry of  
4 Finance. The other organizations are  
5 within the other ministries, and it has a  
6 separate budget.

7 Q. As Deputy Minister of Finance  
8 who do you report to?

9 A. The Minister of Finance.

10 Q. Who is that?

11 A. Shukri Bishara.

12 Q. Do you report to anybody else?

13 A. For me, it's only the Minister  
14 of Finance.

15 Q. What responsibilities come with  
16 your current position?

17 A. To have the Minister of Finance  
18 regulating the financial affairs.

19 Q. For how long have you held this  
20 position?

21 A. Approximately four years.

22 Q. And what did you do before you  
23 began working in this position?

24 A. The general director of the  
25 Palestinian budget.

July 29, 2021

1 Farid Ghannam

2 Q. Was that also within the  
3 Ministry of Finance?

4 A. Yes.

5 Q. And what did you do before you  
6 were general director of the Palestinian  
7 budget?

8 A. The deputy of the general  
9 director of the budget, financial budget.

10 Q. And what did you do before you  
11 began working in that position?

12 A. Main accountant in the -- main  
13 accountant in the general directorate.

14 Q. The general directorate is  
15 within the PA?

16 A. Yes.

17 Q. And what did you do before  
18 that?

19 A. I worked as a sub-accountant in  
20 the general directorate and the budget,  
21 financial budget.

22 Q. And what did you do before  
23 that?

24 A. I was working as an accountant  
25 in the U.S.A.

July 29, 2021

1 Farid Ghannam

2 Q. How long have you been working  
3 for the PA?

4 A. 25 years.

5 Q. For those 25 years did you hold  
6 any title, other than the ones that you  
7 just listed for me as we were going through  
8 your past employment?

9 A. I didn't work in any positions,  
10 other than the ones that I have mentioned  
11 to you.

12 Q. In your current position, are  
13 there any particular aspects of the work of  
14 the Ministry of Finance that are directly  
15 within your purview?

16 A. Within my purview what?

17 Q. Are there any particular  
18 subdivisions of the Ministry of Finance  
19 that report to you, for example?

20 A. As a deputy in the Ministry of  
21 Finance, I follow up with all the  
22 subdivisions of the Ministry of Finance.

23 Q. As a deputy of the Ministry of  
24 Finance, are you engaged in any particular  
25 work that the Ministry of Finance does

July 29, 2021

1 Farid Ghannam

2 internationally?

3 A. I follow up with the European  
4 Union, the Palestinian European Union  
5 financial affairs.

6 THE INTERPRETER: So just to  
7 clarify the second. This is the  
8 interpreter.

9 (Clarifying.)

10 A. The international finance  
11 committee.

12 MR. BALOUL: Objection to the  
13 translation. It's the IMF.

14 Q. Do I understand correctly that  
15 you work with the European Union and the  
16 IMF?

17 A. I follow up with the -- the  
18 financial -- the affairs of the Ministry of  
19 Finance, with both of them.

20 Q. And about how much of that  
21 is -- following up with the financial  
22 affairs of the European Union and the IMF,  
23 about how much of that is the work that you  
24 do for the Ministry of Finance compared to  
25 the other work that you do for the Ministry

July 29, 2021

1 Farid Ghannam

2 of Finance?

3 MR. BERGER: Excuse me. I'm  
4 going to object to the excessive  
5 background questioning. This is a  
6 30(b)(6), not a 30(b)(1) deposition,  
7 but you may answer.

8 A. My main job is within the  
9 Ministry of Finance. These other  
10 responsibilities require much less time  
11 needed than needed in the Ministry of  
12 Finance.

13 Q. Do I understand correctly that  
14 you once worked for USAID?

15 A. Yes.

16 Q. When did you work for USAID?

17 A. In 1995, with the company Louis  
18 Berger, as a contractor for the USAID.

19 Q. Where were you stationed for  
20 that work?

21 A. In Gaza, Palestine.

22 Q. Is it fair to say that you've  
23 worked for USAID or the Palestinian  
24 Authority at all times from 1995 to the  
25 present?



July 29, 2021

1 Farid Ghannam

2 A. Yes, I worked with the  
3 Palestinian Authority from 1996 up until  
4 now.

5 Q. Do you hold any titles within  
6 the PLO?

7 THE INTERPRETER: So this is  
8 the interpreter speaking.

9 (Clarifying.)

10 A. Only to regulate the allowances  
11 for the embassies outside with the PLO.

12 Q. And for that work, do you have  
13 a formal position within the PLO?

14 A. No.

15 Q. For that work, do you report to  
16 somebody within the PLO?

17 A. No.

18 MS. VINCZE: Can I ask you to  
19 please pull up tab 1 onto the screen.  
20 We are marking this as our next  
21 deposition exhibit.

22 (Exhibit 1, 30(b)(6) Notice  
23 dated June 16, 2021, marked for  
24 identification.)

25 Q. Can you see the document,

July 29, 2021

1 Farid Ghannam

2 Mr. Ghannam?

3 A. Yes, I do.

4 MS. VINCZE: This is Exhibit  
5 Number 1. For the record, this is  
6 the 30(b)(6) Notice dated June 16,  
7 2021.

8 MR. BERGER: Do you have an  
9 Arabic translation?

10 MS. VINCZE: No.

11 Q. Do you recognize this document,  
12 Mr. Ghannam?

13 A. Yes.

14 Q. What is it?

15 A. This document was presented to  
16 me, translated into Arabic by the  
17 attorneys, concerning some synonyms, and I  
18 read it.

19 Q. When did you first see it?

20 A. I saw this document about a  
21 month ago.

22 Q. And do I understand it  
23 correctly that you were shown this document  
24 by your attorneys?

25 A. Yes.

July 29, 2021

1 Farid Ghannam

2 Q. Are you appearing today  
3 pursuant to this notice?

4 A. Yes.

5 Q. Are you aware that you are here  
6 to testify on behalf of the PA?

7 A. Yes.

8 Q. Who designated you to testify  
9 on behalf of the PA?

10 A. The Minister of Finance.

11 Q. Are you aware that you are also  
12 here to testify on behalf of the PLO?

13 A. Yes.

14 Q. Who designated you to testify  
15 on behalf of the PLO?

16 A. The Minister of Finance.

17 Q. Have you read the deposition  
18 topics on pages 2 through 3?

19 A. Yes.

20 Q. Topic 1 asks for testimony  
21 regarding any payments made by defendants,  
22 directly or indirectly, after April 18,  
23 2020 to any individual -- pardon me --  
24 payments made by defendants directly --  
25 withdraw the question.

July 29, 2021

1 Farid Ghannam

2 Topic 1 asks for testimony

3 regarding "any payments made by defendants,  
4 directly or indirectly, after April 18,  
5 2020 to any family member of any individual  
6 following such individual's death while  
7 committing any of the specified attacks,  
8 including the reason for such payments."

9 Correct?

10 A. Yes.

11 Q. Are you the person most  
12 knowledgeable about this topic with respect  
13 to the PA?

14 A. Yes.

15 Q. Are you the person the most  
16 knowledgeable about this topic with respect  
17 to the PLO?

18 A. Yes.

19 Q. Do you have direct knowledge of  
20 this topic?

21 A. Yes.

22 Q. How do you have direct  
23 knowledge of this topic?

24 A. All the payments that are made  
25 to the families of the detainees and

July 29, 2021

1 Farid Ghannam

2 martyrs, whether it's inside or outside,  
3 goes through the Minister of Finance.

4 MR. BALOUL: Objection to --  
5 this is Gassan Baloul. Objection to  
6 the translation. He did not say  
7 detainees. He said all payments,  
8 period. No detainees.

9 THE INTERPRETER: This is the  
10 interpreter. He said both.

11 (Cross-talk in Arabic.)

12 MR. BERGER: Why don't we have  
13 him repeat the answer, and maybe this  
14 time he'll give us a little bit more.

15 MS. VINCZE: Mr. Berger, I'm  
16 going to repeat the question, and  
17 then we will have the answer. All  
18 right?

19 Q. Now, how do you have direct  
20 knowledge of this topic?

21 A. All the payments that is made  
22 to the families of the wounded and martyrs,  
23 whether inside or outside, goes through the  
24 Ministry of Finance.

25 MS. VINCZE: A quick question

July 29, 2021

1 Farid Ghannam  
2 for the interpreter. All the  
3 payments made to the families of the  
4 wounded and the what?

5 THE INTERPRETER: The martyrs.

6 MS. VINCZE: Martyrs?

7 THE INTERPRETER: Yes.

8 MS. VINCZE: Thank you.

9 (Court reporter clarification.)

10 Q. Mr. Ghannam, how did you  
11 prepare for today's deposition regarding  
12 this topic?

13 A. After being designated to  
14 testify in this matter, I formed a group of  
15 employees to try, within my accumulative  
16 experience for a long time in the Ministry  
17 of Finance, to gain and to let them obtain  
18 the much possible detailed information  
19 about this matter, as you requested.

20 Q. Who was in that group of em --

21 A. Can I continue?

22 MS. VINCZE: I withdraw the  
23 question. Please continue,  
24 Mr. Interpreter.

25 A. I did call the deputy of the

July 29, 2021

1 Farid Ghannam  
2 Families of Martyrs and Wounded Alliance --  
3 Affairs and we formed a team of work,  
4 including the legal person and the other  
5 representatives to form a working team to  
6 collect this information.

7 Q. Who is the deputy of the  
8 Families of Martyrs and Wounded Affairs?

9 A. Mr. Khaleb Jabern.

10 THE COURT REPORTER: Can you  
11 please spell that for me?

12 THE WITNESS: K-h-a-l-e-b,  
13 J-a-b-e-r-n.

14 Q. Who was in that group of  
15 employees?

16 A. The group of employees in the  
17 Ministry of Finance, Ms. Fida Abu-Ahmed,  
18 the legal consultant and Mr. Tarek Umar, as  
19 an accountant. And Mr. Mohammad Hamasha as  
20 a director of the IT for Saravese. And the  
21 other group in the Martyrs and Wounded  
22 Affairs is Ms. Salim Nasser and Mr. Sula  
23 Manatek (phonetic). Salim -- Ms. Salim  
24 Nasser and Mr. Sula Manatek. Also, the  
25 Wounded and Martyrs Affairs outside,

July 29, 2021

1 Farid Ghannam

2 Ms. Abdul Hamdan.

3 Q. What are the positions of the  
4 people you have listed from the Martyrs and  
5 Wounded Affairs?

6 A. They are the people responsible  
7 for the files in the Martyrs and Wounded  
8 Affairs in Ramallah, and they also  
9 following up with all the files in the  
10 western district and Gaza.

11 (Court Reporter clarification.)

12 THE INTERPRETER: And the ones  
13 who is following up with all the  
14 files in the western district and  
15 Gaza.

16 MR. BALOUL: Excuse me.

17 Another objection to the translation.  
18 West Bank and Gaza.

19 Q. What is Ms. Nasser's position  
20 within the Martyrs and Wounded Affairs?

21 A. She is responsible for the  
22 files.

23 Q. Does she have a title?

24 A. This is her title in the  
25 organization, responsible for the files,



July 29, 2021

1 Farid Ghannam

2 and accountant.

3 Q. And what is Mr. Salaman's  
4 position within Martyrs and Wounded  
5 Affairs?

6 A. The same title for Ms. Salim.

7 MS. VINCZE: Pardon. Can you  
8 repeat that, Mr. Interpreter?

9 THE INTERPRETER: Sure, madam.  
10 The same title.

11 Q. And is that -- is -- I'm going  
12 to mispronounce this name. Is the last  
13 person you listed, did he have the same  
14 title as well?

15 A. Ms. Abdul Hamdan is an  
16 accountant and also responsible for files.

17 Q. And she is also an employee of  
18 Martyrs and Wounded Affairs?

19 A. Yes.

20 Q. Other than Ms. Nasser, Mr. Slay  
21 man, Ms. Hamdan and the deputy of the  
22 Families of Martyrs and Wounded Affairs,  
23 did you speak to anybody else from Martyrs  
24 and Wounded Affairs in preparation for this  
25 deposition?

July 29, 2021

1 Farid Ghannam

2 A. No.

3 Q. And you also mentioned a legal  
4 consultant. Did I hear that right?

5 A. Yes.

6 Q. Who does that legal consultant  
7 work for?

8 A. For the Ministry of Finance.

9 Q. How many times did you meet  
10 with this group from the Ministry of  
11 Finance, the legal consultant and the  
12 ministry of -- sorry, pardon me -- and  
13 Martyrs and Wounded Affairs?

14 A. More than five times.

15 Q. And what did you do at those  
16 meetings?

17 A. We were collecting these files  
18 that you requested, and making sure that  
19 the payment is still continuous with the  
20 Ministry of Finance on and after April 18,  
21 2020.

22 Q. What did you discuss at these  
23 meetings?

24 A. We were collecting all the data  
25 through the computer for all the lists that

July 29, 2021

1 Farid Ghannam

2 you requested, and making sure that there  
3 is no other files which is not included in  
4 the data that you requested.

5 Q. Did you discuss the contents of  
6 any of the files?

7 THE INTERPRETER: I'm sorry,  
8 this is the interpreter.

9 (Clarifying.)

10 A. We were able to look at all the  
11 contents of these files and we found out  
12 that it consists of two parts, financial  
13 part, and the other portion is community  
14 part.

15 MR. BALOUL: This is an  
16 objection to the translation,  
17 investigation report. Social  
18 investigation report.

19 Q. Who spoke to the contents of  
20 the social investigation report?

21 THE INTERPRETER: Sorry.  
22 Continue, ma'am. Sorry.

23 MS. VINCZE: I'll re-ask the  
24 question.

25 Q. Who spoke to the contents of

July 29, 2021

1 Farid Ghannam

2 the social investigation report?

3 A. Who spoke for?

4 MS. VINCZE: Is that the  
5 complete translation?

6 THE INTERPRETER: No, ma'am.

7 This is the interpreter. It was a  
8 question to verify your question.

9 Q. My question is, who spoke about  
10 the contents of the social investigation  
11 report at those meetings?

12 A. The deputy of the wounded and  
13 martyrs affairs organization.

14 Q. And what did he say?

15 A. He spoke and said it consists  
16 of three divisions; personal informations,  
17 financial informations regarding the  
18 families of the martyrs and wounded, and  
19 social informations.

20 Q. Did he explain how these  
21 reports are prepared?

22 A. When the death happens, the  
23 family of the wounded or martyr visits the  
24 organization and goes through the social  
25 worker to do this report.

July 29, 2021

1 Farid Ghannam

2 Q. And to clarify. The  
3 explanation that you gave me, that is what  
4 this deputy explained to you in these  
5 meetings?

6 A. Yes.

7 Q. So do I understand correctly  
8 that you met with this group more than five  
9 times?

10 A. Yes.

11 Q. How long were those meetings?

12 A. Each meeting lasted for  
13 approximately three to four hours.

14 Q. And the deputy minister who was  
15 present in that meeting, was that Mr.  
16 Jabern?

17 A. Khaleb Jabern.

18 Q. Did you review any documents  
19 regarding this topic in preparation for  
20 this deposition?

21 A. Yes.

22 Q. What documents did you review?

23 A. I reviewed and looked at all  
24 the documents that were presented to you.

25 Q. Did any of these documents

July 29, 2021

1 Farid Ghannam

2 refresh your recollection about facts or  
3 issues relating to this topic?

4 A. Can you repeat the question  
5 again, please?

6 Q. Did any of these documents that  
7 you reviewed refresh your recollection  
8 about facts or issues relating to this  
9 topic?

10 THE INTERPRETER: I'm sorry,  
11 just to clarify the question.

12 (Clarifying.)

13 A. No.

14 Q. Apart from meeting with this  
15 group that you put together, did you meet  
16 with anybody else in preparation for this  
17 deposition?

18 A. I met with a group of attorneys  
19 representing the Ministry of Finance,  
20 Mr. Gassan, Mr. Mitch and Salim.

21 Q. And did you meet with anybody  
22 else, other than these attorneys that you  
23 have listed and the members of the group  
24 that you have described?

25 A. No.

July 29, 2021

1 Farid Ghannam

2 MS. VINCZE: Simek, can you

3 please scroll down to topic 3 of the  
4 deposition notice.

5 Q. Topic 3 asks for "testimony  
6 with respect to each payment reflected on  
7 the documents, number Shatsky-JD1 through  
8 Shatsky-JD10 and Shatsky-JD12 through  
9 Shatsky-JD534 that defendants produced in  
10 jurisdictional discovery: (a) whether the  
11 payment was made in respect of a person who  
12 was imprisoned for committing or who died  
13 while committing an act of terrorism; (b)  
14 if so, the date, location and nature of  
15 such act of terrorism and whether such act  
16 of terrorism injured or killed a National  
17 of the United States; (c), whether the  
18 recipient of the payment is a family member  
19 and/or a designee of the person in respect  
20 of who the payment was made; (d), the  
21 reason for which the payment was made; and  
22 (e), the source of the funds that were used  
23 to make the payment." Correct?

24 A. Yes.

25 Q. Are you the person the most

July 29, 2021

1 Farid Ghannam

2 knowledgeable about this topic with respect  
3 to the PA?

4 A. Yes.

5 Q. Are you the person the most  
6 knowledgeable about this topic with respect  
7 to the PLO?

8 A. Yes.

9 Q. Do you have direct knowledge of  
10 this topic?

11 A. Yes.

12 Q. How do you have direct  
13 knowledge of this topic?

14 A. As I mentioned to you before,  
15 the deputy of the Ministry of Finance and  
16 the representatives of -- and the  
17 overseeing all the departments in the  
18 Ministry of Finance, and all the  
19 information goes through that, and as the  
20 payments are made through the Ministry of  
21 Finance, I have a full knowledge of this  
22 topic.

23 Q. How did you prepare for today's  
24 deposition regarding this topic?

25 A. I requested consultation and



July 29, 2021

1 Farid Ghannam  
2 discussions with the attorneys and from the  
3 Wounded and Martyrs Affairs, and we had  
4 these discussions regarding this topic.

5 Q. Did you prepare for this topic  
6 differently from how you prepared for topic  
7 number 1?

8 A. The same mechanism of  
9 preparation.

10 Q. What did you discuss with the  
11 attorneys from Martyrs and Wounded Affairs?

12 A. We discussed and we consulted  
13 about the files and the laws that governs  
14 the mechanisms worked with regarding the  
15 topics in the Martyrs and Wounded Affairs.  
16 And there were no attorneys from the  
17 Martyrs and Wounded Affairs to discuss  
18 what -- to discuss the topic, but it was  
19 discussed with the group that was formed  
20 from the Martyrs and Wounded. Also with  
21 our attorneys who were assigned.

22 Q. To clarify. When you say "our  
23 attorneys," were these attorneys of the  
24 Ministry of Finance?

25 A. No, the group of attorneys

July 29, 2021

1 Farid Ghannam  
2 assigned from the Ministry of Finance, and,  
3 as I mentioned to you, it's Gassan,  
4 Mr. Gassan, Mitch and Salim.

5 Q. Did you speak to attorneys from  
6 the Ministry of Finance when Mr. Berger and  
7 Mr. Gassan and others from Squire Patton  
8 Boggs were not present?

9 THE INTERPRETER: This is the  
10 interpreter speaking. You are  
11 breaking up. Can you repeat the  
12 question?

13 Q. Did you speak to attorneys from  
14 the Ministry of Finance about this topic  
15 and in preparation for this topic when  
16 Mr. Berger and Mr. Baloul and others from  
17 Squire Patton Boggs were not present?

18 A. Yes. As I mentioned to you  
19 before, within the group of team, the group  
20 there for this was the legal consultant,  
21 Ms. Fidak Abu Hmaid.

22 THE COURT REPORTER: What is  
23 the last name, please?

24 MR. BERGER: Abu Hmaid. It's  
25 A-B-U, space, Hmaid, H-M-A-I-D.

July 29, 2021

1 Farid Ghannam

2 And, Counsel, when you get to a  
3 convenient stopping point, we've been  
4 going about an hour and a half, we  
5 will appreciate a short break.

6 MS. VINCZE: I've got a couple  
7 of more questions, and then we can  
8 take our break.

9 MR. BERGER: Sounds good.

10 Q. Mr. Ghannam, it was with this  
11 group that you discussed the laws that  
12 govern the mechanisms regarding these  
13 topics and the Martyrs and Wounded Affairs?

14 A. The affairs to govern the  
15 matters of families of wounded and martyrs,  
16 yes.

17 Q. What laws?

18 A. There is a law that was  
19 produced and modified the previous law. It  
20 was produced in 2016, governing the taking  
21 care of the families of the wounded and  
22 martyrs.

23 Q. Do you know the title of that  
24 law?

25 THE INTERPRETER: This is the

July 29, 2021

1 Farid Ghannam

2 interpreter. I will repeat the

3 question.

4 (Question repeated.)

5 THE INTERPRETER: This is the

6 interpreter. The respondent didn't

7 hear me clearly, so I will repeat the

8 question.

9 (Question repeated.)

10 A. It's the law taking care of the

11 families of wounded and martyrs.

12 MS. VINCZE: All right. Let's

13 go off the record, please, and take a

14 five-minute break.

15 THE VIDEOGRAPHER: We are now

16 off the record. The time is 13:02

17 UTC time.

18 (A recess was taken.)

19 THE VIDEOGRAPHER: We are back

20 on the record. The time is 13:18 UTC

21 time.

22 MS. VINCZE: Thank you.

23 Q. Mr. Ghannam, earlier we were

24 speaking about how you're preparing to

25 speak on topic 3, is that right?

July 29, 2021

1 Farid Ghannam

2 A. Yes.

3 Q. And you mentioned that you met  
4 with certain employees of the Ministry of  
5 Finance?

6 A. Yes.

7 Q. Who did you meet with from the  
8 Ministry of Finance?

9 A. I met with Mohammad Hamasha,  
10 the IT for the salaries in the Ministry of  
11 Finance. Ms. Fidak Abu Hmaid, the legal  
12 consultant for the Ministry of Finance.  
13 And Ms. Deltalik Omal, (phonetic), an  
14 accountant in the Ministry of Finance.

15 Q. Did you meet with anybody else  
16 from the Ministry of Finance in preparation  
17 for this deposition?

18 A. No.

19 Q. Subsequent to the date we  
20 issued this notice, defendants produced  
21 other documents reflecting payments made by  
22 defendants directly or indirectly after  
23 April 18, 2020 to family members of  
24 individuals who died while committing  
25 certain of the specified attacks. I

July 29, 2021

1 Farid Ghannam

2 believe those documents have production

3 numbers JD559 through JD1101.

4 Are you similarly prepared to  
5 answer questions about those later-produced  
6 documents?

7 A. Yes.

8 MS. VINCZE: Simek, can you  
9 please pull up tab 7 onto the screen.  
10 We are marking this as our next  
11 deposition exhibit. I believe that  
12 makes it Exhibit Number 2. It's a  
13 document we received from -- well,  
14 hold on, here we go. It's a document  
15 we received from defendants with  
16 production numbers JD12 through  
17 JD249.

18 (Exhibit 2, Document Bates  
19 stamped Shatsky-JD00012 through  
20 Shatsky-JD00249, marked for  
21 identification.)

22 Q. Mr. Ghannam, can you see the  
23 document?

24 A. I'm waiting.

25 MS. VINCZE: Simek, can you

July 29, 2021

1 Farid Ghannam

2 please scroll down to the original,  
3 that is JD12, not the translation.

4 MR. BERGER: We don't have any  
5 document up on the screen.

6 MS. VINCZE: Do you have paper  
7 copies available?

8 MR. BERGER: We're trying to  
9 get them.

10 MS. VINCZE: Okay.

11 MR. BERGER: 12 through 249. I  
12 don't think we have them organized by  
13 that way, but you'll tell us.

14 MS. VINCZE: Well, these are  
15 the documents you produced to us,  
16 production numbers JD12 through  
17 JD249.

18 MR. BERGER: Yeah, I heard you  
19 the first time. I'm telling you we  
20 don't have our paper copies organized  
21 that way.

22 MS. VINCZE: Can you put these  
23 documents in front of him?

24 MR. BERGER: Okay, now it's up  
25 on the screen.

July 29, 2021

1 Farid Ghannam

2 Q. Mr. Ghannam, can you see the  
3 document?

4 I can repeat the question.  
5 Mr. Ghannam, can you see the document?

6 A. Yes.

7 Q. Do you recognize it?

8 A. Yes.

9 Q. What is it?

10 A. This is a document prepared by  
11 the affair -- by the Martyrs and Wounded  
12 family affairs to represent the financial  
13 component regarding Muslim -- regarding the  
14 Bay Sala Hadine (phonetic) --

15 (Interpreter speaking in  
16 Arabic.)

17 THE COURT REPORTER: I'm sorry,  
18 I didn't understand that last part.

19 THE INTERPRETER: Regarding --  
20 this is the interpreter. This is a  
21 name. It is Sala Hadine Jadalahasan.  
22 (Phonetic).

23 Q. Mr. Ghannam, I'm going to  
24 represent to you that this exhibit contains  
25 the originals with production numbers JD12



July 29, 2021

1 Farid Ghannam

2 through JD -- I believe it is 249.

3 MS. VINCZE: Mr. Berger, would  
4 you stipulate that these are business  
5 records admissible under Rule 8036 of  
6 Federal Rules of Evidence?

7 MR. BERGER: Yeah, I think we  
8 sent you a written stipulation to  
9 that effect about two weeks ago, and  
10 never heard back from you. But, yes.

11 MS. VINCZE: But, yes? Thank  
12 you.

13 MR. BERGER: Yes.

14 MS. VINCZE: Okay.

15 Q. Looking at this page, Mr.  
16 Ghannam, this refers to the Martyrs and  
17 Wounded Affairs Establishment, is that  
18 right?

19 A. Correct.

20 Q. Is that the same Martyrs and  
21 Wounded Affairs that you were working with  
22 to prepare for this deposition?

23 A. Yes.

24 Q. What is the Martyrs and Wounded  
25 Affairs Establishment?

July 29, 2021

1 Farid Ghannam

2 A. It's an estab -- one of the  
3 establishments of the Palestinian  
4 Authorities that present support for the  
5 families of wounded and martyrs. They  
6 present financial support for these  
7 families, and rehabilitation, to enable  
8 them to live a decent living and to prevent  
9 financial needs and to have a good living  
10 condition in the community.

11 Q. Who is the head of the martyrs,  
12 families and injured -- pardon -- the  
13 Martyrs and Wounded Affairs Establishment?

14 A. The Minister Intissar al-Wazir.

15 Q. Does she have any other titles  
16 within the PA?

17 A. No.

18 Q. Does she have any other -- any  
19 titles within the PLO?

20 A. She was the head of the PLO  
21 when it was outside. And when the PLO came  
22 inside, when the PA has been established in  
23 1994, and she continued to be the head of  
24 the PLO.

25 Q. Does she still have that

July 29, 2021

1 Farid Ghannam

2 position?

3 MR. BALOUL: Sorry, Counsel,  
4 this is another objection to the  
5 translation. Not the head of the  
6 PLO. The head of the ministry of --

7 (Court reporter clarification.)

8 MR. BALOUL: The head of the  
9 ministry of the families of martyrs  
10 and those injured.

11 MS. VINCZE: The head of the?  
12 I can't hear you.

13 MR. BALOUL: The institute of  
14 the -- for the families of the  
15 martyrs and those injured.

16 MS. VINCZE: Mr. Interpreter,  
17 is that what Mr. Ghannam said?

18 THE INTERPRETER: I thought --  
19 this is interpreter speaking now.  
20 Not on the other part. The question  
21 was does she hold any positions in  
22 the PLO. This was the question  
23 pending.

24 MS. VINCZE: That is correct.  
25 And what was the answer that Mr.

July 29, 2021

1 Farid Ghannam

2 Ghannam provided?

3 THE INTERPRETER: My  
4 understanding was he was referring to  
5 the PLO. I'm more than happy to  
6 clarify that, if you want me.

7 (Indiscernible male voice.)

8 MS. VINCZE: I will repeat the  
9 question. No, no, Mr. -- first of  
10 all, I can't hear who's speaking  
11 right now, but I will re-ask the  
12 question and then we will get the  
13 answer that we get and take it from  
14 there.

15 Q. Mr. Ghannam, what -- withdrawn.

16 Mr. Ghannam, does Ms. Al-Wazir  
17 hold any titles within the PLO?

18 A. For the time being, she doesn't  
19 hold any position in the PLO.

20 Q. Did she hold a title in the PLO  
21 previously?

22 A. Yes.

23 Q. What was that title?

24 A. She was the head of the  
25 establishment of the martyrs and wounded

July 29, 2021

1 Farid Ghannam

2 that belongs to the PLO.

3 Q. And when did the establishment  
4 of the martyrs and wounded belong to the  
5 PLO?

6 A. It joined it in 1968.

7 Q. And until when was it part of  
8 the PLO?

9 A. Until 1999.

10 Q. What happened in 1999?

11 MR. BERGER: Go ahead, please.

12 I'll note my objection after you  
13 translate.

14 (Interpreter translates.)

15 MR. BERGER: Objection.

16 Outside the time frame for  
17 jurisdictional discovery, but you may  
18 answer.

19 A. In 1999, the followers of the  
20 martyrs and wounded were transferred from  
21 outside the country to inside -- to become  
22 inside the country, and it became part of  
23 the social ministry, social affairs  
24 ministry, and so it was headed by Minister  
25 Intissar al-Wazir.

July 29, 2021

1 Farid Ghannam

2 Q. Is the social affairs ministry  
3 part of the PA?

4 A. It's part of the PA.

5 Q. And, if I understand correctly,  
6 it was part of the PA in 1999?

7 MR. BERGER: Objection.

8 Outside the scope of the notice and  
9 outside the scope of jurisdictional  
10 discovery, but you may answer if you  
11 know.

12 A. Yes, up until 1999, it was part  
13 of the PLO. From 1999, it became under the  
14 PA, up until 2006, where it became  
15 separated from the Ministry of Social  
16 Affairs, to become a separate establishment  
17 that has its own budget and affairs.

18 Q. To clarify. When you say it  
19 became a separate establishment, does that  
20 mean it's an establishment within the PA?

21 MR. BERGER: Same objection.

22 You may answer if you know.

23 A. It became an establishment  
24 within the PA, but it's independent, and  
25 it's independent within its financial

July 29, 2021

1 Farid Ghannam

2 and -- affairs and, has a subdivision in  
3 the general budget.

4 Q. Since 2006, has the Martyrs and  
5 Wounded Affairs Establishment ever been --  
6 ever belonged to the PLO?

7 MR. BERGER: Objection. The  
8 question is outside the scope of the  
9 notice and outside the scope of  
10 jurisdictional discovery. Counsel,  
11 unless you can make a representation  
12 about why a question related to 2006  
13 is within the scope of the  
14 jurisdictional discovery allowed by  
15 the court, I am going to instruct the  
16 witness not to answer in order to  
17 enforce a limitation imposed by the  
18 court on the scope of discovery.

19 MS. VINCZE: Mr. Berger, it is  
20 not outside the scope of the notice.  
21 We are asking -- we are asking  
22 questions about the reason for these  
23 payments, and he is appearing on  
24 behalf of both the PO and the --  
25 sorry, the PA and the PLO. There is

July 29, 2021

1 Farid Ghannam

2 no time limitation about questions  
3 into the reasons for payments made  
4 when those payments are made within  
5 the relevant time period.

6 MR. BERGER: Your question is  
7 not about payments. If that's your  
8 representation, then I instruct him  
9 not to answer because it's outside  
10 the scope of jurisdictional discovery  
11 and outside the scope of your notice.

12 MS. VINCZE: Mr. Berger, it  
13 is -- the question goes to the reason  
14 these payments were made, and he is  
15 making these -- he is appearing and  
16 giving answers on behalf of the PLO.  
17 Now, I'm asking questions about the  
18 reasons that these payments were  
19 made, and that goes to reasons that  
20 existed even before April 18, 2020.

21 MR. BERGER: If you want to ask  
22 the question about since April 18,  
23 2020, which is the jurisdictional  
24 predicate that Judge Vyskocil made  
25 clear on April 29, 2019 in her order



July 29, 2021

1 Farid Ghannam  
2 is the scope of jurisdictional  
3 discovery, you may ask the question  
4 that relates to April 18, 2020. But  
5 your question begins, and I'm looking  
6 at the transcript, "since 2006."  
7 2006 is not April 18, 2020.

8 MS. VINCZE: Mr. Berger, I  
9 think our position on this is clear.  
10 If you continue to believe that you  
11 have a basis to instruct Mr. Ghannam  
12 not to answer, then this may be a  
13 dispute we need to take to Judge  
14 Freeman.

15 MR. BERGER: He can answer this  
16 question. But if you continue to ask  
17 about things that are outside the  
18 scope of discovery and outside the  
19 scope of the notice, then, yes, we  
20 will take it to the court. You asked  
21 about payments. You have yet to ask  
22 more than three questions relating to  
23 payments on or after April 18, 2020,  
24 and we are two-plus hours into this  
25 deposition.

July 29, 2021

1 Farid Ghannam

2 Answer this question, and then

3 we'll take it after that.

4 A. What is the question again?

5 Q. I will ask it again. Since  
6 2006, has the Martyrs and Wounded Affairs  
7 Establishment ever belonged to the PLO?

8 A. No.

9 Q. Who does Ms. al-Wazir report  
10 to?

11 A. Ms. al-Wazir was appointed to  
12 head the establishment of the wounded and  
13 martyrs, and the one who she is supposed  
14 to, or appointed her is the minister's  
15 committee, Palestinian Ministers Committee.

16 Q. Since 2006, has the wounded and  
17 martyrs affairs establishment always been  
18 an independent entity with its own budget  
19 item within the PA?

20 MR. BERGER: Objection.

21 Instruct the witness not to answer.  
22 Outside the scope of jurisdictional  
23 discovery.

24 MS. VINCZE: Mr. Berger, our  
25 position on this is clear. I

July 29, 2021

1 Farid Ghannam

2 think -- let's go off the record and

3 let's discuss calling the judge.

4 THE VIDEOGRAPHER: We are now

5 off the record. The time is 13:46

6 UTC time.

7 (Off the record.)

8 THE VIDEOGRAPHER: We are back

9 on the record. The time is 13:53 UTC

10 time.

11 Q. I will re-ask the question.

12 Since 2006, has the wounded and martyrs

13 affairs establishment always been its

14 independent entity with a budget item

15 within the PA?

16 MR. BERGER: And I will

17 reassert my objection, that the

18 question is outside the scope of

19 jurisdictional discovery and outside

20 the scope of the notice, but I will

21 let the witness answer this question.

22 A. Yes.

23 Q. Who determines the size of the

24 Martyrs' Families and Injured Care

25 Establishment's operating budget?

July 29, 2021

1 Farid Ghannam

2 A. It's an establishment like any  
3 other establishment, it would be within the  
4 general budget. The budget is discussed  
5 depending on the financial needs of this  
6 establishment and the document presented.

7 Q. Now, Mr. Ghannam, do I  
8 understand correctly that among the things  
9 the martyrs and -- martyrs' families and  
10 wounded care establishment does, is that it  
11 provides support to the families of the  
12 wounded and martyrs?

13 A. Yes.

14 Q. What kinds of support?

15 A. The kind of support that it  
16 provides for the martyrs' families and  
17 wounded, it's the financial support based  
18 on the needs of the family that is  
19 determined by the --

20 (Cross-talk in Arabic.)

21 A. Also, it provides  
22 rehabilitation and health programs for the  
23 martyrs' families and wounded.

24 Q. What is the basis for the  
25 establishment's authority to provide those

July 29, 2021

1 Farid Ghannam

2 kinds of support?

3 MR. BERGER: Objection,  
4 ambiguous. You may answer if you  
5 understand the question.

6 A. This establishment works  
7 according to the law that governs the  
8 health -- taking care of the family --  
9 martyrs' families and wounded, and whatever  
10 the laws say, the establishment works  
11 according to that law.

12 Q. Does that include the 2016 law  
13 that you mentioned previously?

14 A. Yes.

15 Q. How is the work of the Martyrs'  
16 Family and Injured Care Establishment  
17 funded?

18 A. From the general budget.

19 Q. And what is the source of the  
20 funds allocated to it from the general  
21 budget?

22 A. The general income that comes  
23 from the taxes collected, directly and  
24 indirectly, from the Palestinian  
25 population.

July 29, 2021

1 Farid Ghannam

2 MS. VINCZE: Can I ask you to  
3 please pull up tab 8. We can mark  
4 this as our next deposition exhibit.  
5 It's a document -- let's page down to  
6 the original. Thank you.

7 (Exhibit 3, Document Bates  
8 stamped Shatsky-JD00113 through  
9 Shatsky-JD00117, marked for  
10 identification.)

11 MS. VINCZE: This is a document  
12 we received from defendants with  
13 production numbers JD113 through  
14 JD117. This is Exhibit 3, I believe.

15 Mr. -- go ahead.

16 (Interpreter interpreting.)

17 Q. Mr. Ghannam, can you see this  
18 document?

19 A. Yes.

20 Q. What is it?

21 A. This is a document generated  
22 from the martyrs and wounded family affairs  
23 regarding the financial division that  
24 belongs to the financial support for the  
25 family of the martyr.

July 29, 2021

1 Farid Ghannam

2 Q. Under personal information, it  
3 says four-part name, Sadeq Ahed Mahmoud Abd  
4 Al-Hafez, right?

5 A. Yes.

6 Q. Who is Mr. Al-Hafez?

7 A. Who?

8 Q. Who is he?

9 THE INTERPRETER: I'm sorry.

10 This is the interpreter speaking now.

11 He's asking who is the name you are  
12 referring to?

13 Q. On the document, it says  
14 four-part name, Sadeq Ahed Mahmoud Abd  
15 Al-Hafez, correct?

16 A. Yes.

17 Q. Who is Mr. Sadeq Ahed Mahmoud  
18 Abd Al-Hafez?

19 A. According to the definition of  
20 the establishment of the martyrs' families  
21 and wounded, and according to the law of  
22 the establishment of the martyrs' families  
23 and wounded, he's a martyr.

24 Q. What is a martyr?

25 THE INTERPRETER: I'm sorry.

July 29, 2021

Farid Ghannam

This is the interpreter. I'm going to ask him to break it down, because it's complex matters.

A. The martyr is a person who lost his life, regardless of his age, according to the definition law for the establishment of the martyrs and wounded families.

It's a person who lost his life, regardless of the age, as a result of direct acts of the occupation or distinct occupation or upon sequences of the occupation, or who has been held captive in detention and lost his life while in prison, or a person who loses his life a year after being released from prison as a result of being in prison, or a wounded person who loses his life as a result of these wounds within three years' period of the time of being wounded.

Q. Are all martyrs dead?

A. Definitely.

Q. Now, when I'm looking at this document, there's a section called "Categories." Right?



July 29, 2021

1 Farid Ghannam

2 A. Yes.

3 Q. And beneath that, there is a  
4 table, correct?

5 A. Yes.

6 Q. And one of the columns in that  
7 table is titled "Scale." Correct?

8 A. Yes.

9 Q. Beneath that, it says "New  
10 Scale for the Families of Martyrs." Right?

11 A. Yes.

12 Q. What is that?

13 A. This division means it's the  
14 allocations and the deductions that is  
15 given to the family of the martyr, to the  
16 people -- to the individuals and the  
17 persons in need, according to the law that  
18 governs the establishment of the wounded  
19 and martyrs' families.

20 Q. Who sets that scale?

21 A. It's implementing the divisions  
22 of the law that governs the establishment  
23 of martyrs and families affairs that  
24 determines the beneficiaries and the amount  
25 paid for the people in need.

July 29, 2021

1 Farid Ghannam

2 Q. And who determines how that law  
3 will be implemented?

4 A. Division 5 and Division 10 of  
5 that law determines in details who's the  
6 beneficiaries and the amount of allocation  
7 and it's the division also that determines  
8 whether that person is married or single  
9 and the allocations paid for the children.  
10 This is in Division 5 and Division 10.

11 Q. Of which law?

12 A. It's the law that governs  
13 taking care of the families of martyrs and  
14 wounded, law number -- for the year 2016.

15 (Court reporter clarification.)

16 MS. VINCZE: This is for the  
17 interpreter. But he provided a  
18 number before the year of the law,  
19 didn't he?

20 THE INTERPRETER: No, ma'am.

21 It's for year 2016.

22 MS. VINCZE: For year 2016.

23 Q. On this document it says "case  
24 type, martyr." Right?

25 A. Yes.

July 29, 2021

1 Farid Ghannam

2 Q. Does that mean that

3 Mr. Al-Hafez has been determined to be a  
4 martyr?

5 A. Yes.

6 Q. And under that there is a  
7 section called "Beneficiaries' Data."  
8 Correct?

9 A. Yes. Yes.

10 Q. And there is a name provided in  
11 that section, correct?

12 A. Yes.

13 Q. That name is Ahed Mahmoud Abd  
14 Al-Hafez, correct?

15 A. Yes.

16 Q. What does it mean that his name  
17 is there?

18 A. This means this person is the  
19 beneficiary person who's going to receive  
20 the payment that is determined by the law  
21 for the martyr's family.

22 MS. VINCZE: Simek, can we page  
23 down to 114.

24 Q. There's a section at the top of  
25 this page called "Discontinuation Data."

July 29, 2021

1 Farid Ghannam

2 Correct?

3 A. Yes.

4 Q. What does that mean?

5 A. This -- these are information  
6 about the beneficiary. And in situations,  
7 the beneficiary's details change depending  
8 on the economic condition of the family,  
9 and this is fully determined by the  
10 establishment for the martyrs and wounded.

11 Q. So what does it mean that the  
12 reason for discontinuation here -- first of  
13 all, reason for discontinuation here, I see  
14 "last credit." Is that right?

15 A. This is what is mentioned in  
16 the document.

17 Q. What does that mean?

18 A. This means that the information  
19 of the beneficiary is updated by the  
20 establishment of the martyrs and wounded on  
21 a yearly basis, and this means that when  
22 the beneficiary is capable of supporting  
23 himself, this -- his portion is going to be  
24 terminated.

25 MS. VINCZE: Simek, can we go

July 29, 2021

1 Farid Ghannam

2 back to 113.

3 Q. Now, I'm looking at the middle  
4 of the page under the section called  
5 "Beneficiary's Data" and we have two  
6 columns, "percentage value" and  
7 "percentage." Do you see those two?

8 A. Yes.

9 Q. Thank you. It says "percentage  
10 100." Right?

11 A. Yes.

12 Q. What does that mean?

13 A. This means that the beneficiary  
14 is eligible for 100 percent, according to  
15 the laws that govern the establishment of  
16 the martyrs and wounded. What means that  
17 this beneficiary is going to receive  
18 100 percent of the payment according to the  
19 economic needs for the family that is  
20 determined by the establishment.

21 MS. VINCZE: Can we go back to  
22 JD114, please.

23 Q. There's a table here -- there's  
24 a section here that says "Stipend Data at  
25 Bank:" Correct?

July 29, 2021

1 Farid Ghannam

2 A. Yes.

3 MS. VINCZE: Simek, can you  
4 please page down to JD117.

5 Q. A lot of the information in  
6 this table has been blacked out, correct?

7 A. Yes.

8 Q. What is the information that  
9 has been blacked out?

10 A. It's the information before  
11 April 18, 2020, which is the cause for the  
12 witnessing of the appearance today.

13 Q. Is this banking information?

14 A. This is information that does  
15 not consent with the duration that is in  
16 question. That's it.

17 Q. Looking at the rows that have  
18 not been blacked out, I see there are  
19 columns titled Month, ID No., Name,  
20 Stipend. What is the information in these  
21 rows?

22 A. It's -- we have four columns on  
23 this document. The first column is the  
24 month, it's April of 2020, and then the ID  
25 number, and then the name of the

July 29, 2021

1 Farid Ghannam

2 beneficiary, and then the amount of the  
3 salary received by the beneficiary that is  
4 determined according to the law, and this  
5 is on a monthly basis and the currency is  
6 in Shekel.

7 Q. What does it mean that it's  
8 Mr. Al-Hafez's name in the name column?

9 A. It means that he is the  
10 beneficiary of this allocation.

11 Q. And in the month column, we  
12 have April 1, 2020 through April 1, 2021,  
13 right?

14 A. Yes, ma'am.

15 Q. Is it fair to say this shows  
16 that Mr. Al-Hafez has been receiving  
17 monthly payments from April 2020 through  
18 April 2021?

19 A. Yes.

20 Q. And to clarify. This is  
21 Mr. Ahed Mahmoud Abdallah Abd Al-Hafez and  
22 not Mr. Sadeq Ahed Mahmoud Abd Al-Hafez,  
23 who is dead?

24 A. Yes.

25 Q. And Mr. Ahed Mahmoud Abdallah

July 29, 2021

1 Farid Ghannam

2 Abd Al-Hafez is receiving these payments as  
3 the beneficiary of Mr. Sadeq Ahed Mahmoud  
4 Abd Al-Hafez, correct?

5 A. Yes.

6 Q. And under stipend, it  
7 consistently shows 1400, correct?

8 A. One -- 1400 Shekel, correct.

9 Q. So it's fair to say that Mr. --

10 (Court reporter clarification.)

11 Q. Is it fair to say that, as the  
12 beneficiary, Mr. Ahed Mahmoud Abdallah Abd  
13 Al-Hafez has received a monthly stipend of  
14 1400 Shekels from April 2020 through  
15 April 2021?

16 A. He received a monthly  
17 allocation of 1400 Shekels from April of  
18 2020 up until April of 2021, on a monthly  
19 basis.

20 Q. And he received this monthly  
21 allocation as a direct result of Sadeq Ahed  
22 Mahmoud Abd Al-Hafez's martyrdom, is that  
23 right?

24 A. Not correct.

25 Q. Why do you say it's not



July 29, 2021

1 Farid Ghannam

2 correct?

3 A. He received it according to the  
4 law that governs the work of the  
5 establishment for martyrs and wounded to  
6 support the family, because the family is  
7 in need, and it's not because their son is  
8 a martyr. This -- these amounts are for  
9 economical support for the families of the  
10 martyred person.

11 Q. Mr. Sadeq Ahed Mahmoud Abd  
12 Al-Hafez was determined to be a martyr by  
13 the Martyrs' Families and Injured Care  
14 Establishment, correct?

15 A. Yes.

16 Q. And he was determined to be a  
17 martyr because the Martyrs' Families and  
18 Injured Care Establishment reviewed the  
19 applicable regulations and laws and decided  
20 that he qualified, correct?

21 A. Yes.

22 Q. That is why on JD113 it says  
23 "Case Type Martyr," correct?

24 A. Yes.

25 Q. And if Mr. Sadeq Ahed Mahmoud

July 29, 2021

1 Farid Ghannam

2 Abd Al-Hafez had not been determined to be  
3 a martyr, then his -- then Ahed Mahmoud  
4 Abdallah Abd Al-Hafez would not be  
5 receiving these payments, correct?

6 A. According to the law of the  
7 establishment of the martyrs and wounded  
8 affairs, he has to be considered as a  
9 martyr, and then, according to the law, it  
10 has to be a financial need for the family,  
11 and it's determined by the establishment  
12 for martyrs and family and the wounded  
13 family affairs that the family is in need,  
14 and that, therefore, this allocation was  
15 dispensed to the family to cover the  
16 economic needs.

17 Q. But, if Mr. Ahed Mahmoud  
18 Abdallah Abd Al-Hafez was simply in need,  
19 and his son had not been determined to be a  
20 martyr, then he would not be receiving  
21 these payments, correct?

22 A. According to the law, yes.

23 MS. VINCZE: Okay. I would  
24 like to take a quick break, so let's  
25 go off the record and take our little

July 29, 2021

1 Farid Ghannam

2 five-minute break.

3 (Recess taken.)

4 THE VIDEOGRAPHER: We are off  
5 the record. The time is 14:34 UTC  
6 time.

7 (A recess was taken.)

8 THE VIDEOGRAPHER: We are on  
9 the record. The time is 14:47 UTC  
10 time.

11 MS. VINCZE: We would like to  
12 designate this as Exhibit Number 4, I  
13 believe.

14 (Exhibit 4, Document Bates  
15 stamped Shatsky-JD00977 through  
16 Shatsky-JD00990, marked for  
17 identification.)

18 Q. This is a document we have  
19 received from defendants, production  
20 numbers JD977 through JD9900 -- I'm sorry,  
21 JD990.

22 Mr. Ghannam, do you recognize  
23 this document?

24 A. Yes.

25 Q. And you can see it?

July 29, 2021

1 Farid Ghannam

2 A. Yes.

3 Q. What is it?

4 A. This is a document produced  
5 from the establishment for the wounded and  
6 martyrs family affairs, and this document  
7 is called social search.

8 Q. Social search.

9 MR. BALOUL: No, it's social  
10 investigation.

11 MR. BERGER: I think that's --  
12 the translation is -- we think is  
13 investigation, not search.

14 MS. VINCZE: I see.

15 Q. Mr. Ghannam, when you spoke  
16 about preparing for the deposition today,  
17 you mentioned looking at social  
18 investigative reports, I believe. Is that  
19 right?

20 A. Yes.

21 Q. Is this the kind of document  
22 you were referring to?

23 A. Yes.

24 Q. What is a social investigative  
25 report?

July 29, 2021

1 Farid Ghannam

2 A. This report is -- I will call  
3 that is done by an investigator from the  
4 establishment of the martyrs and wounded  
5 affairs that investigates when a family  
6 submits a request. The investigation is  
7 done to make sure that the family is in  
8 need, and this is as a result of the loss  
9 of one of their children.

10 Q. When you say "when a family  
11 submits a request," is that a written  
12 request?

13 A. The family goes to the  
14 establishment for the wounded and martyrs  
15 affairs and they meet with the social  
16 worker.

17 Q. Is the social worker the same  
18 person who prepares the report?

19 A. Yes.

20 Q. How does the family know to go  
21 to the social worker?

22 A. When a martyr death happens in  
23 a Palestinian family, the family goes to  
24 the establishment of the martyrs and  
25 wounded family affairs, and they are met by

July 29, 2021

1 Farid Ghannam

2 a social worker or social investigator to  
3 make sure that the family is in need for  
4 this allocation.

5 Q. Let's turn to -- back to the  
6 document. It says "Case: Martyr of  
7 Al-Aqsa Intifada." Correct?

8 A. This is what is written in the  
9 social investigation report. It's written  
10 as martyr of Al-Aqsa Intifada.

11 (Court reporter clarification.)

12 Q. And that information was  
13 provided by the employee of the Martyrs'  
14 Families and Injured Care Establishment  
15 that wrote this report, correct?

16 A. Yes.

17 Q. What does Al-Aqsa Intifada  
18 mean?

19 A. Al-Aqsa Intifada, it's a  
20 population movement against the occupation.

21 Q. And there is a date on this  
22 document, correct?

23 A. Yes.

24 Q. March 3, 2002?

25 A. Yes.

July 29, 2021

1 Farid Ghannam

2 Q. What is the significance of  
3 that date?

4 A. This date indicates the date  
5 that the family visited or came to the  
6 establishment of martyrs and wounded.

7 Q. And it says "Governorate:  
8 Qalqilya." Correct?

9 A. Yes.

10 Q. What is the significance of  
11 that?

12 A. The importance of this is to  
13 indicate whom did the investigation as the  
14 division of the office and the government  
15 of Qalqilya.

16 Q. Looking at the upper left  
17 corner of the document -- upper right  
18 corner, pardon me. It says -- it has the  
19 Palestinian Authority's emblem on it,  
20 correct?

21 A. Yes.

22 Q. So this report was issued when  
23 the Martyrs' Families and Injured Care  
24 Establishment was still part of the PA,  
25 correct?

July 29, 2021

1 Farid Ghannam

2 A. Yes, within the Palestinian  
3 Authority and the ministry of the social  
4 affairs.

5 Q. Let's turn to the next page,  
6 978. The top of the page says "Part 1:  
7 Personal Information." Correct?

8 A. Yes.

9 Q. And it says the case's name  
10 Sadeq Ahed Mahmoud Abd Al-Hafez, correct?

11 A. Yes.

12 Q. Is that the same Sadeq Ahed  
13 Mahmoud Abd Al-Hafez that we were  
14 discussing before?

15 A. Yes.

16 Q. So that is the person who is  
17 designated as a martyr in Exhibit 3?

18 A. Yes.

19 Q. And it says "Beneficiary's full  
20 name, Ahed Mahmoud Abdallah Abd Al-Hafez."  
21 Correct?

22 A. Yes.

23 Q. And beneath that name, in  
24 parentheses, it says "wife, father, mother,  
25 brother, sister." Correct?



July 29, 2021

1 Farid Ghannam

2 A. Yes.

3 Q. And father is circled?

4 A. Yes.

5 Q. Does that mean Ahed Mahmoud

6 Abdallah Abd Al-Hafez is the father of

7 Sadeq Ahed Mahmoud Abd Al-Hafez?

8 A. Yes.

9 Q. Part 2 of the document reads

10 "Administrative Information." Correct?

11 A. Yes.

12 Q. And one of the subsections of

13 this reads "Place and date of the

14 incident." Correct?

15 A. (Question translated - no

16 English answer provided).

17 Q. What is the purpose of that

18 subsection?

19 THE COURT REPORTER: I'm sorry.

20 What is the answer? Was it

21 translated?

22 THE INTERPRETER: Yes. Yes.

23 The answer is yes.

24 MS. VINCZE: I can repeat the

25 question.

July 29, 2021

1 Farid Ghannam

2 Q. And there is a subsection that  
3 reads "Place and date of the incident."  
4 Correct?

5 A. Yes.

6 Q. What is the purpose of that  
7 subsection?

8 A. This is documentation on the  
9 investigation report on the first page to  
10 document the date and the location of the  
11 incident.

12 Q. What does the incident mean?

13 A. The incident is documented as  
14 it's seen in the social investigation  
15 report, and it's written -- the details are  
16 written in the administrative information  
17 mentioned.

18 Q. So, this is a pre-printed form  
19 we are looking at that was prepared by the  
20 Martyrs' Families and Injured Care  
21 Establishment, correct?

22 A. Yes.

23 Q. And when the -- withdrawn.  
24 What information did the Martyrs' Families  
25 and Injured Care Establishment seek when it

July 29, 2021

1 Farid Ghannam

2 asked after the incident?

3 A. The establishment for martyrs  
4 and wounded family affairs investigates,  
5 through the social investigator, the death  
6 and the incident, and this can be done  
7 either from the death certificate, if it's  
8 available and present, or a certificate  
9 from the hospital to prove the death, if  
10 it's available.

11 Q. And there is some handwritten  
12 information in the subsection, correct?

13 A. Yes.

14 Q. It says "February 16, 2002  
15 Karnei Shomron Settlement near Qalqilya."  
16 Correct?

17 A. Yes.

18 Q. Why is that there?

19 A. These information includes to  
20 document the date and the location of the  
21 incidents.

22 MS. VINCZE: Can you repeat  
23 that?

24 THE INTERPRETER: This  
25 information is present to document

July 29, 2021

1 Farid Ghannam

2 the location and the date of the  
3 incident.

4 Q. That's where and when Sadeq  
5 Ahed Mahmoud Abd Al-Hafez died, correct?

6 A. As it appears in the document,  
7 yes.

8 Q. Whose handwriting is that; who  
9 wrote that?

10 A. The social investigator.

11 Q. And how did the social  
12 investigator determine that that was the  
13 date and location of Mr. Sadeq Ahed Mahmoud  
14 Abd Al-Hafez's death?

15 A. From the death certificate for  
16 the martyr death, as submitted by the  
17 family of the martyr.

18 Q. And there's a subsection called  
19 "Details of the incident." Correct?

20 A. Yes.

21 Q. After that, it reads "Martyrdom  
22 Operation in Karnei Shomron Settlement."  
23 Correct?

24 A. Yes.

25 Q. Who wrote that?

July 29, 2021

1 Farid Ghannam

2 A. The social investigator.

3 Q. What is the Karnei Shomron

4 Settlement?

5 A. It's one of the settlements in  
6 the West Bank.

7 Q. What does martyrdom operation  
8 mean?

9 A. As it's written in the  
10 document, it's a martyrdom operation that  
11 led to the death of a person.

12 Q. How did the employee of the  
13 Martyrs' Families and Injured Care  
14 Establishment determine that this was a  
15 martyrdom operation?

16 THE INTERPRETER: I'm sorry,  
17 this is the interpreter. It was  
18 fading out. I'll ask him to repeat.

19 (Clarifying.)

20 A. The social investigator who  
21 works in the establishment documents the  
22 martyr has happened, and he doesn't  
23 investigate the causes of the martyrdom  
24 through either the death certificate or the  
25 hospital certificate that is provided by

July 29, 2021

1 Farid Ghannam

2 that family.

3 Q. What is a martyrdom?

4 A. The martyrdom is a person who  
5 loses his life, regardless of the age, as a  
6 result of the occupation at, or the defense  
7 against occupation or the consequences of  
8 the occupation, up until the definition  
9 that I mentioned previously.

10 MR. BALOUL: Objection to the  
11 translation. The witness started by  
12 saying "pursuant to the law," and  
13 then he said everything that he  
14 translated.

15 MS. VINCZE: I'm sorry, I can't  
16 hear what you said, Mr. Baloul.

17 MR. BALOUL: Is this better?

18 MS. VINCZE: Yeah.

19 MR. BALOUL: I said, objection  
20 to the translation. It was all  
21 correct, but for the missing of the  
22 word pursuant -- or the words  
23 "pursuant to the law" at the  
24 beginning.

25 MS. VINCZE: Well, I -- I'm

July 29, 2021

1 Farid Ghannam

2 sorry, I'm going to re-ask the  
3 question, because I don't understand.

4 MR. BALOUL: Okay.

5 Q. So, Mr. Ghannam, what is a  
6 martyrdom?

7 A. The definition of the  
8 martyrdom, pursuant to the law of the  
9 establishment of the martyrs and wounded  
10 cares for the families, is a person who  
11 loses his life, regardless of the age, as a  
12 result of the direct act of the occupation  
13 or resisting the occupation or consequences  
14 of the occupation, until the end of the  
15 definition that I mentioned previously  
16 pursuant to the law.

17 Q. Is every person who is killed  
18 by the Israeli authorities a martyr?

19 A. You say that is a martyrdom,  
20 yes.

21 Q. So if somebody was shoplifting  
22 and he was shot by an Israeli soldier, would  
23 he be a martyr?

24 MR. BERGER: Objection to the  
25 form of the question. Calls for

July 29, 2021

1 Farid Ghannam

2 speculation. But you may answer.

3 A. The martyr, as I mentioned  
4 previously, and pursuant to the law, is the  
5 person who loses his life, regardless of  
6 the age, as a result of the direct acts of  
7 the occupation or resisting the occupation,  
8 or as a consequence of the occupation.

9 Q. Mr. Ghannam, I'm trying to  
10 understand your answer. If, for example,  
11 somebody was shot while committing armed  
12 robbery, would that person be a martyr  
13 under the laws you reference?

14 MR. BERGER: Object to the form  
15 of the question. Hypothetical.  
16 Calls for speculation.

17 Q. Mr. Ghannam, you may answer.

18 A. I repeat again the definition  
19 that I mentioned. Pursuant to the law and  
20 the establishment of the wounded and  
21 martyrs affair, is a person who loses his  
22 life, regardless of the age, as a result of  
23 the direct acts of the occupation or  
24 resisting the occupation or as a  
25 consequence of the occupation.



July 29, 2021

1 Farid Ghannam

2 Q. Mr. Ghannam, you are not  
3 answering my question. I'm going to ask  
4 another one.

5 When the person who was filling  
6 out this report wrote "martyrdom  
7 operation," what did he mean?

8 A. He meant that this person lost  
9 his life, and, pursuant to the law, this  
10 person was considered as a martyr.

11 Q. What law?

12 A. I didn't hear.

13 THE INTERPRETER: I will repeat  
14 the question.

15 A. The law that governs the  
16 establishment of martyrs and wounded family  
17 affairs.

18 Q. Do social investigators receive  
19 any guidance from the Martyrs' Families and  
20 Injured Care Establishment on how that law  
21 is to be understood, when evaluating  
22 submissions from families?

23 A. The social investigator depends  
24 on documents and information that he  
25 receives from the family, and these

July 29, 2021

1 Farid Ghannam

2 documents is either a death certificate or  
3 a certificate from the hospital, and these  
4 regulations are put to the law that governs  
5 the establishment of the martyrs and  
6 wounded family affairs.

7 Q. Do they receive any training on  
8 what to do with the documents and  
9 information they receive?

10 A. Yes. It's explained within the  
11 law.

12 (Court reporter clarification.)

13 Q. I don't understand. What  
14 training do they receive?

15 A. He is an employee, the social  
16 investigator is an employee who implements  
17 the law that have the sections that  
18 explains the way to act, based on the  
19 divisions that govern the law and the work  
20 for that social investigator.

21 Q. Does he receive any training,  
22 other than receiving printouts or other  
23 electronic copies of the law that he is  
24 supposed to implement?

25 A. He only implements the law that

July 29, 2021

1 Farid Ghannam  
2 has sections to explain the mechanism of  
3 war and how to implement the work that is  
4 needed within the social investigation  
5 mechanism.

6 Q. Isn't it true that on this  
7 document, martyrdom operation refers to an  
8 act by which a person seeks to become a  
9 martyr?

10 A. This document explains that a  
11 person died and was considered as a martyr,  
12 according to the law, and it documents the  
13 location and the date of the incident.

14 Q. What about his death qualified  
15 him to be a martyr?

16 A. The qualification is the loss  
17 of life, as the law indicated in the  
18 definition of the martyrdom.

19 Q. Okay. Very well. Let's turn  
20 to page 979.

21 MR. BERGER: Counsel, while  
22 you're doing so, we're coming up on  
23 the agreed end time, so if you can  
24 wrap it up within some period of time  
25 reasonably at 11:30, or shortly

July 29, 2021

1 Farid Ghannam

2 thereafter, we would appreciate it.

3 MS. VINCZE: Sure.

4 Q. The top of the document reads  
5 "Family Table." Correct?

6 A. Yes.

7 Q. And then it provides the  
8 information of seven people, correct?

9 A. Yes.

10 Q. On the bottom it says "Number  
11 of dependents." Correct?

12 A. Yes.

13 Q. And it says there are four  
14 dependents?

15 A. Yes.

16 Q. Why are there four dependents  
17 when there are seven people listed?

18 A. According to the criteria  
19 mentioned at the top of the page, it states  
20 the person who is married will include the  
21 wife and the minor children. Does then the  
22 second point states that the single  
23 includes the parents and the sibling, minor  
24 siblings, and this is, according to that  
25 rule, the number of the beneficiaries at

July 29, 2021

1 Farid Ghannam

2 four.

3 (Court reporter clarification.)

4 Q. One of the columns says  
5 "Relationship to the case." Right?

6 A. Yes.

7 Q. What is the information in that  
8 column?

9 A. Father, mother, brother,  
10 sister, sister, sister.

11 Q. What is the significance of  
12 that column?

13 A. This column indicates the  
14 composition of the family within need that  
15 is mentioned in the investigator -- social  
16 investigator's report.

17 Q. And that's after the  
18 relationship to the martyr, correct?

19 A. Yes.

20 Q. Why is the relationship to the  
21 martyr important?

22 A. To indicate the relationship  
23 between the martyr and the family members  
24 of the martyr who needs the assistance, as  
25 a result of the death of that martyr.

July 29, 2021

1 Farid Ghannam

2 Q. But why does the Martyrs'  
3 Families and Injured Care Establishment  
4 care what the relationship is between these  
5 people and the martyr?

6 A. Because it looks into the need  
7 of the family members of this family, as a  
8 result of the loss of that person.

9 Q. Are the payments made to the  
10 family members?

11 A. The payment is usually made to  
12 the head of the household, and it's based  
13 on the family member of -- family members  
14 and the need.

15 Q. Let's look at JD980. There are  
16 three signatures on this document, correct?

17 A. Yes.

18 Q. The first signature is under  
19 "Recommendations of the Department."  
20 Correct?

21 A. Yes.

22 Q. Why is that signature there?

23 A. Definitely, to verify the  
24 accuracy of the information that came in  
25 the social investigation report.

July 29, 2021

1 Farid Ghannam

2 Q. That includes verifying the  
3 statement that -- the statement "Martyrdom  
4 Operation in Karnei Shomron Settlement"?

5 A. This verifies the accuracy of  
6 what the social investigator has written  
7 based on the social investigation, on the  
8 information of the family that has a  
9 martyr.

10 Q. But that includes the statement  
11 "Martyrdom Operation in Karnei Shomron  
12 Settlement." Correct?

13 A. It document what has been --  
14 the information that has been written in  
15 the social investigator's report.

16 Q. Another signature is under  
17 "Decision of the Establishment's Director,"  
18 correct?

19 A. Yes.

20 Q. What does that mean?

21 A. This indicates that at the  
22 verification of the information, that the  
23 social investigator had written by the head  
24 of the department, it is approved by the  
25 general director to consider him as a

July 29, 2021

1 Farid Ghannam

2 martyr since the date of martyrdom.

3 Q. What is the date of martyrdom?

4 THE INTERPRETER: This is the

5 -- I will interpret what the

6 respondent has said, but the question

7 was misunderstood, because it said

8 definition again.

9 A. So, again, as I mentioned

10 before, the definition of martyrdom is a

11 person who -- a person under the law is a

12 person who loses his life, regardless of

13 the age, as a result of a direct occupation

14 act or as a result of the continuing

15 occupation or as a consequence of the

16 occupation up until the end of the law, as

17 I mentioned previously, pursuant to the

18 law. Up until the end of the definition,

19 sorry, as I mentioned previously, pursuant

20 to the law.

21 Q. All right. I'm going to ask my

22 question again, because that wasn't my

23 question.

24 My question was, what is the

25 date of martyrdom?



July 29, 2021

1 Farid Ghannam

2 A. The date of martyrdom, as is  
3 mentioned in the information written in the  
4 investigation report, is February 16, 2002.

5 MS. VINCZE: I have no more  
6 questions for today. Let's go off  
7 the record, please.

8 THE VIDEOGRAPHER: We are off  
9 the record. The time is 15:38 UTC  
10 time.

11 MS. VINCZE: We would like a  
12 rough draft.

13 THE COURT REPORTER:  
14 Mr. Berger, would you like a rough  
15 draft?

16 MR. BERGER: Yes, please.

17 (Off the record at 11:38 a.m.)

18

19 -----

20 FARID GHANNAM

21 Subscribed and sworn to before me  
22 this day of , 2021

23

24 -----

25 NOTARY PUBLIC

July 29, 2021

## REPORTER'S CERTIFICATION

I, ROBERTA CAIOLA, hereby certify that FARID GHANNAM, the witness in the foregoing deposition, was duly sworn to testify to the truth and nothing but the truth in the within-entitled cause; that said deposition was taken at the time and place herein named; that the deposition is a true record of the witness's testimony as reported by me, a shorthand reporter and a disinterested person.

I further certify that I am not interested in the outcome of the said action, nor connected with, nor related to any of the parties in said action, nor to their respective counsel.

IN WITNESS WHEREOF, I have hereunto set my hand on July 30, 2021.

Roberta Caiola

-----

ROBERTA CAIOLA

## ERRATA SHEET

I, FARID GHANNAM, do hereby certify that I have read the foregoing transcript of my testimony, and further certify that said transcript is a true and accurate record of my testimony (with the exception of the following corrections listed below):

Page	Line	Correction
------	------	------------

[illegible]

Signed under penalties of perjury

this                      day of                      , 2021.

-----

FARID GHANNAM

July 29, 2021

<b>Exhibits</b>	<b>100</b> 68:10,14,18	<b>1995</b> 23:17,24	55:25
<b>EX 0001 Farid Ghannam 0729</b>	<b>113</b> 68:2	<b>1996</b> 24:3	<b>3</b>
<b>21</b> 3:7 24:22 25:4,5	<b>114</b> 66:23	<b>1999</b> 52:9,10,19 53:6,12,13	<b>3</b> 26:18 38:3,5 43:25 61:7, 14 77:24 79:17
<b>EX 0002 Farid Ghannam 0729</b>	<b>11:30</b> 90:25	<b>2</b>	<b>30</b> 23:6
<b>21</b> 3:9 45:12,18	<b>11:32</b> 4:13	<b>2</b> 26:18 45:12, 18 80:9	<b>30(b)(4)</b> 6:20
<b>EX 0003 Farid Ghannam 0729</b>	<b>11:38</b> 96:17	<b>2002</b> 14:21 77:24 82:14 96:4	<b>30(b)(6)</b> 23:6 24:22 25:6
<b>21</b> 3:12 61:7,14 79:17	<b>12</b> 46:11	<b>2006</b> 14:24 53:14 54:4,12 56:6,7 57:6, 16 58:12	<b>4</b> 74:12,14
<b>EX 0004 Farid Ghannam 0729</b>	<b>13:02</b> 43:16	<b>2016</b> 42:20 60:12 65:14,21,22	<b>5</b>
<b>21</b> 3:15 74:12, 14	<b>13:18</b> 43:20	<b>2019</b> 55:25	<b>5</b> 65:4,10
<b>(</b>	<b>13:46</b> 58:5	<b>202.7</b> 5:14	<b>7</b>
<b>(a)</b> 38:10	<b>13:53</b> 58:9	<b>2020</b> 5:15 26:23 27:5 33:21 44:23 55:20, 23 56:4,7,23 69:11,24 70:12,17 71:14,18	<b>7</b> 45:9
<b>(b)</b> 38:13	<b>1400</b> 71:7,8,14,17	<b>2021</b> 4:12 24:23 25:7 70:12, 18 71:15,18 96:22	<b>8</b>
<b>(b)(1)</b> 23:6	<b>14:34</b> 74:5	<b>249</b> 46:11 48:2	<b>8</b> 61:3
<b>(c)</b> 38:17	<b>14:47</b> 74:9	<b>25</b> 21:4,5	<b>8036</b> 48:5
<b>(d)</b> 38:20	<b>15:38</b> 96:9	<b>29</b> 4:12 6:24	<b>9</b>
<b>(e)</b> 38:22	<b>16</b> 24:23 25:6 82:14 96:4		
<b>1</b>	<b>18</b> 26:22 27:4 33:20 44:23 55:20,22 56:4,7,23 69:11		
	<b>19</b> 5:15		
	<b>1968</b> 52:6		
	<b>1983</b> 14:17		
	<b>1994</b> 49:23		

July 29, 2021

<b>979</b> 90:20	<b>accuracy</b> 93:24 94:5	57:6,17 58:13 61:22 64:23 73:8, 13 75:6 76:5,15,25 79:4 82:4 88:17 89:6	70:8 71:22 83:14
<b>A</b>	<b>accurate</b> 8:21		<b>al-wazir</b> 49:14 51:16 52:25 57:9, 11
<b>A-B-U</b> 41:25	<b>accurately</b> 11:23		<b>Alexandria</b> 14:13
<b>a.m.</b> 96:17	<b>acknowledge</b> 5:6,10	<b>age</b> 63:6,10 85:5 86:11 87:6, 22 95:13	<b>Alliance</b> 15:23 16:20 17:22 30:2
<b>A1</b> 8:8	<b>act</b> 38:13,15 86:12 89:18 90:8 95:14	<b>ago</b> 25:21 48:9	<b>allocated</b> 60:20
<b>Abd</b> 62:3,14,18 66:13 70:21, 22 71:2,4, 12,22 72:11 73:2,4,18 79:10,13,20 80:6,7 83:5, 14	<b>action</b> 4:21	<b>agree</b> 5:24 6:3 7:6,9	<b>allocation</b> 65:6 70:10 71:17,21 73:14 77:4
<b>Abdallah</b> 70:21,25 71:12 73:4, 18 79:20 80:6	<b>acts</b> 63:11 87:6, 23	<b>agreed</b> 90:23	<b>allocations</b> 64:14 65:9
<b>Abdul</b> 31:2 32:15	<b>address</b> 7:24	<b>agreement</b> 4:9 5:20,21	<b>allowances</b> 24:10
<b>Abed</b> 7:25	<b>administer</b> 5:12	<b>ahead</b> 9:23 52:11 61:15	<b>allowed</b> 54:14
<b>able</b> 11:21 34:10	<b>administered</b> 5:11	<b>Ahed</b> 62:3,14,17 66:13 70:21, 22,25 71:3, 12,21 72:11, 25 73:3,17 79:10,12,20 80:5,7 83:5, 13	<b>ambiguous</b> 60:4
<b>Abu</b> 41:21,24 44:11	<b>administrativ e</b> 80:10 81:16		<b>AMIRI</b> 6:4
<b>Abu-ahmed</b> 30:17	<b>admissible</b> 48:5		<b>amount</b> 64:24 65:6 70:2
<b>accommodate</b> 10:6 11:4	<b>affair</b> 17:6 47:11 87:21		<b>amounts</b> 72:8
<b>accountant</b> 20:12,13,24 30:19 32:2, 16 44:14	<b>affairs</b> 16:2,4,21,25 17:13,23 19:18 22:5, 18,22 30:3, 8,22,25 31:5,8,20 32:5,18,22, 24 33:13 35:13 40:3, 11,15,17 42:13,14 47:12 48:17, 21,25 49:13 52:23 53:2, 16,17 54:2,5	<b>Ahmed</b> 7:25	<b>and/or</b> 38:19
<b>accounting</b> 14:4,5 15:5		<b>Al-aqsa</b> 77:7,10,17, 19	<b>answer</b> 9:6,16,22,23 10:8,17 11:22 23:7 28:13,17 45:5 50:25 51:13 52:18 53:10,22 54:16 55:9 56:12,15 57:2,21 58:21 60:4 80:16,20,23
<b>accumulative</b> 29:15		<b>Al-hafez</b> 62:4,6,15,18 66:3,14 70:16,21,22 71:2,4,13 72:12 73:2, 4,18 79:10, 13,20 80:6,7 83:5	
		<b>Al-hafez's</b>	

July 29, 2021

87:2,10,17 <b>answering</b> 9:4 88:3 <b>answers</b> 6:8 10:11,16 55:16 <b>anybody</b> 19:12 32:23 37:16,21 44:15 <b>Apart</b> 37:14 <b>appearance</b> 69:12 <b>appearing</b> 26:2 54:23 55:15 <b>appears</b> 83:6 <b>applicable</b> 72:19 <b>appointed</b> 57:11,14 <b>appreciate</b> 42:5 91:2 <b>appropriate</b> 7:2 <b>approved</b> 94:24 <b>approximately</b> 19:21 36:13 <b>April</b> 26:22 27:4 33:20 44:23 55:20,22,25 56:4,7,23 69:11,24 70:12,17,18 71:14,15,17, 18 <b>Arabic</b> 6:7,8 25:9, 16 28:11 47:16 59:20 <b>ARABIC-HADEER</b> 6:4	<b>armed</b> 87:11 <b>arrangement</b> 5:17 <b>asked</b> 56:20 82:2 <b>asking</b> 7:17 54:21 55:17 62:11 <b>asks</b> 26:20 27:2 38:5 <b>aspects</b> 21:13 <b>assigned</b> 40:21 41:2 <b>assistance</b> 92:24 <b>assume</b> 9:17 <b>attacks</b> 27:7 44:25 <b>attorney</b> 10:5 <b>attorneys</b> 5:5 25:17,24 37:18,22 40:2,11,16, 21,23,25 41:5,13 <b>authorities</b> 49:4 86:18 <b>authority</b> 12:5,9 15:18 16:5,6,14,25 18:9,13,17 19:2 23:24 24:3 59:25 79:3 <b>Authority's</b> 78:19 <b>available</b> 46:7 82:8,10 <b>aware</b> 4:4 26:5,11	<hr/> <b>B</b> <hr/> <b>bachelor's</b> 14:8,11,16 <b>back</b> 43:19 48:10 58:8 68:2,21 77:5 <b>background</b> 12:17 23:5 <b>Baloul</b> 14:2 22:12 28:4,5 31:16 34:15 41:16 50:3,8,13 75:9 85:10, 16,17,19 86:4 <b>Bank</b> 18:19 31:18 68:25 84:6 <b>banking</b> 12:21 13:18, 25 14:4 69:13 <b>based</b> 59:17 89:18 93:12 94:7 <b>basis</b> 56:11 59:24 67:21 70:5 71:19 <b>Bates</b> 45:18 61:7 74:14 <b>Bay</b> 47:14 <b>began</b> 19:23 20:11 <b>begin</b> 6:14 14:18 <b>beginning</b> 85:24 <b>begins</b> 56:5	<b>behalf</b> 4:17,24 6:2 7:8 15:8 26:6,9,12,15 54:24 55:16 <b>believe</b> 45:2,11 48:2 56:10 61:14 74:13 75:18 <b>belong</b> 52:4 <b>belonged</b> 54:6 57:7 <b>belongs</b> 52:2 61:24 <b>beneath</b> 64:3,9 79:23 <b>beneficiaries</b> 64:24 65:6 91:25 <b>Beneficiaries</b> ' 66:7 <b>beneficiary</b> 66:19 67:6, 19,22 68:13, 17 70:2,3,10 71:3,12 <b>beneficiary's</b> 67:7 68:5 79:19 <b>Berger</b> 5:25 6:2 7:7,8 10:10 23:3,18 25:8 28:12,15 41:6,16,24 42:9 46:4,8, 11,18,24 48:3,7,13 52:11,15 53:7,21 54:7,19 55:6,12,21 56:8,15 57:20,24 58:16 60:3 75:11 86:24
---	--	---	---

July 29, 2021

87:14 90:21 96:14,16 <b>besides</b> 16:16 <b>best</b> 10:6 <b>better</b> 85:17 <b>Birzeit</b> 13:23 <b>Bishara</b> 19:11 <b>bit</b> 28:14 <b>blacked</b> 69:6,9,18 <b>Boggs</b> 6:2 41:8,17 <b>bottom</b> 91:10 <b>break</b> 10:5,9,14 42:5,8 43:14 63:3 73:24 74:2 <b>breaking</b> 41:11 <b>breaks</b> 10:3,22 <b>briefly</b> 12:16 <b>Broad</b> 4:19 <b>brother</b> 79:25 92:9 <b>budget</b> 19:6,25 20:7,9,20,21 53:17 54:3 57:18 58:14, 25 59:4 60:18,21 <b>business</b> 48:4	<hr/> <b>c</b> <hr/> <b>Caiola</b> 4:24 6:6 7:2,5 <b>call</b> 29:25 76:2 <b>called</b> 6:4,10 63:24 66:7,25 68:4 75:7 83:18 <b>calling</b> 58:3 <b>Calls</b> 86:25 87:16 <b>capable</b> 67:22 <b>captive</b> 63:13 <b>care</b> 42:21 43:10 58:24 59:10 60:8,16 65:13 72:13, 18 77:14 78:23 81:20, 25 84:13 88:20 93:3,4 <b>cares</b> 86:10 <b>case</b> 7:16 65:23 72:23 77:6 92:5 <b>case's</b> 79:9 <b>Categories</b> 63:25 <b>certain</b> 44:4,25 <b>certificate</b> 15:3 82:7,8 83:15 84:24, 25 89:2,3 <b>certificates</b> 15:6	<b>certification</b> <b>s</b> 15:2 <b>change</b> 67:7 <b>children</b> 65:9 76:9 91:21 <b>circled</b> 80:3 <b>cities</b> 15:24 16:3, 21 17:23,24 <b>Civil</b> 6:21 <b>clarification</b> 15:25 29:9 31:11 50:7 65:15 71:10 77:11 89:12 92:3 <b>clarify</b> 22:7 36:2 37:11 40:22 51:6 53:18 70:20 <b>Clarifying</b> 16:12 22:9 24:9 34:9 37:12 84:19 <b>clear</b> 55:25 56:9 57:25 <b>clearly</b> 43:7 <b>Cohen</b> 5:23 <b>collect</b> 30:6 <b>collected</b> 60:23 <b>collecting</b> 33:17,24 <b>column</b> 69:23 70:8, 11 92:8,12, 13	<b>columns</b> 64:6 68:6 69:19,22 92:4 <b>come</b> 19:15 <b>comes</b> 60:22 <b>committee</b> 16:23 17:17, 21 18:4 22:11 57:15 <b>committing</b> 27:7 38:12, 13 44:24 87:11 <b>community</b> 34:13 49:10 <b>company</b> 23:17 <b>compared</b> 22:24 <b>complete</b> 35:5 <b>complex</b> 63:4 <b>component</b> 47:13 <b>composition</b> 92:14 <b>computer</b> 33:25 <b>condition</b> 49:10 67:8 <b>confer</b> 10:15 <b>conference</b> 6:23 <b>confirm</b> 6:19 <b>consent</b> 5:17 69:15 <b>consequence</b> 87:8,25 95:15 <b>consequences</b> 85:7 86:13
--	--	---	--

July 29, 2021

<b>consider</b> 94:25	<b>correct</b> 15:9 27:9	<b>cover</b> 73:15	<b>decided</b> 72:19
<b>considered</b> 73:8 88:10	38:23 48:19	<b>COVID-19</b> 6:17 8:24	<b>Decision</b> 94:17
90:11	50:24 62:15	<b>credit</b> 67:14	<b>deductions</b> 64:14
<b>consistent</b> 10:11	64:4,7 66:8, 11,14 67:2	<b>criteria</b> 91:18	<b>defendants</b> 6:3,19 7:8
<b>consistently</b> 71:7	68:25 69:6	<b>cross-talk</b> 28:11 59:20	12:4 26:21, 24 27:3 38:9
<b>consists</b> 34:12 35:15	71:4,7,8,24	<b>Cuomo</b> 5:14	44:20,22
<b>consultant</b> 30:18 33:4, 6,11 41:20	72:2,14,20, 23 73:5,21	<b>currency</b> 70:5	45:15 61:12
44:12	77:7,15,22	<b>current</b> 19:16 21:12	74:19
<b>consultation</b> 39:25	78:8,20,25		<b>defense</b> 85:6
<b>consulted</b> 40:12	79:7,10,21, 25 80:10,14		<b>Definitely</b> 63:22 93:23
<b>contains</b> 47:24	81:4,21	<b>D</b>	<b>definition</b> 62:19 63:7
<b>contents</b> 34:5,11,19, 25 35:10	82:12,16	<b>data</b> 33:24 34:4	85:8 86:7,15
<b>continue</b> 29:21,23	83:5,19,23	66:7,25	87:18 90:18
34:22 56:10, 16	85:21 91:5, 8,11 92:18	68:5,24	95:8,10,18
<b>continued</b> 49:23	93:16,20	<b>date</b> 38:14 44:19	<b>degree</b> 11:10 12:20, 24 14:9,11, 16,21,23
<b>continuing</b> 95:14	94:12,18	77:21 78:3,4	<b>Deltalik</b> 44:13
<b>continuous</b> 33:19	<b>correctly</b> 22:14 23:13	80:13 81:3, 10 82:20	<b>department</b> 93:19 94:24
<b>contractor</b> 23:18	25:23 36:7	83:2,13	<b>departments</b> 39:17
<b>convenient</b> 42:3	53:5 59:8	90:13 95:2, 3,25 96:2	<b>dependents</b> 91:11,14,16
<b>conversations</b> 4:7	<b>counsel</b> 5:16 9:20,22	<b>dated</b> 24:23 25:6	<b>depending</b> 59:5 67:7
<b>copies</b> 46:7,20	10:10 42:2	<b>day</b> 96:22	<b>depends</b> 88:23
89:23	50:3 54:10	<b>dead</b> 63:21 70:23	<b>deposition</b> 4:11 5:6,7,9
<b>Corey</b> 4:16	90:21	<b>death</b> 27:6 35:22	6:22 7:3
<b>corner</b> 78:17,18	<b>country</b> 52:21,22	76:22 82:5, 7,9 83:14, 15,16 84:11, 24 89:2	8:10,22 10:4
	<b>couple</b> 42:6	90:14 92:25	23:6 24:21
	<b>courses</b> 14:6	<b>decent</b> 49:8	26:17 29:11
	<b>court</b> 5:4 8:19		32:25 36:20
	15:25 29:9		37:17 38:4
	30:10 31:11		39:24 44:17
	41:22 47:17		
	50:7 54:15, 18 56:20		
	65:15 71:10		
	77:11 80:19		
	89:12 92:3		
	96:13		



July 29, 2021

45:11 48:22 56:25 61:4 75:16 <b>deputy</b> 8:6 15:13 19:7 20:8 21:20,23 29:25 30:7 32:21 35:12 36:4,14 39:15 <b>described</b> 37:24 <b>designate</b> 74:12 <b>designated</b> 15:7 26:8,14 29:13 79:17 <b>designee</b> 38:19 <b>detailed</b> 29:18 <b>details</b> 65:5 67:7 81:15 83:19 <b>detainees</b> 27:25 28:7,8 <b>detention</b> 63:14 <b>determine</b> 83:12 84:14 <b>determined</b> 59:19 66:3, 20 67:9 68:20 70:4 72:12,16 73:2,11,19 <b>determines</b> 58:23 64:24 65:2,5,7 <b>died</b> 38:12 44:24 83:5 90:11 <b>differently</b> 40:6 <b>direct</b> 27:19,22	28:19 39:9, 12 63:11 71:21 86:12 87:6,23 95:13 <b>directly</b> 21:14 26:22, 24 27:4 44:22 60:23 <b>director</b> 19:24 20:6,9 30:20 94:17, 25 <b>directorate</b> 20:13,14,20 <b>discontinuati on</b> 66:25 67:12, 13 <b>discovery</b> 38:10 52:17 53:10 54:10, 14,18 55:10 56:3,18 57:23 58:19 <b>discuss</b> 33:22 34:5 40:10,17,18 58:3 <b>discussed</b> 40:12,19 42:11 59:4 <b>discussing</b> 79:14 <b>discussions</b> 40:2,4 <b>dispensed</b> 73:15 <b>dispute</b> 56:13 <b>distinct</b> 63:11 <b>district</b> 31:10,14 <b>division</b> 61:23 64:13 65:4,7,10	78:14 <b>divisions</b> 35:16 64:21 89:19 <b>document</b> 11:2 24:25 25:11,15,20, 23 45:13,14, 18,23 46:5 47:3,5,10 59:6 61:5,7, 11,18,21 62:13 63:24 65:23 67:16 69:23 74:14, 18,23 75:4, 6,21 77:6,22 78:17 80:9 81:10 82:20, 25 83:6 84:10 90:7, 10 91:4 93:16 94:13 <b>documentation</b> 81:8 <b>documented</b> 81:13 <b>documents</b> 10:25 36:18, 22,24,25 37:6 38:7 44:21 45:2,6 46:15,23 84:21 88:24 89:2,8 90:12 <b>doing</b> 90:22 <b>draft</b> 96:12,15 <b>duly</b> 6:5,11 <b>duration</b> 69:15 <hr/> <b>E</b> <hr/> <b>earlier</b>	43:23 <b>economic</b> 67:8 68:19 73:16 <b>economical</b> 72:9 <b>education</b> 12:18,19 <b>educational</b> 12:17 <b>effect</b> 48:9 <b>Egypt</b> 14:14 <b>either</b> 82:7 84:24 89:2 <b>electronic</b> 89:23 <b>eligible</b> 68:14 <b>em</b> 29:20 <b>embassies</b> 24:11 <b>emblem</b> 78:19 <b>employee</b> 32:17 77:13 84:12 89:15, 16 <b>employees</b> 29:15 30:15, 16 44:4 <b>employment</b> 16:5 17:15 18:12,15 21:8 <b>enable</b> 49:7 <b>encourage</b> 18:5 <b>end</b> 86:14 90:23 95:16,18 <b>enforce</b> 54:17
--	---	---	--

July 29, 2021

<b>engaged</b> 21:24	<b>evaluating</b> 88:21	<b>fair</b> 23:22 70:15	18:1 19:1
<b>English</b> 6:7,8 11:7, 8,11,13,14, 15 80:16	<b>everyone</b> 4:3	71:9,11	20:1 21:1
<b>enter</b> 4:25	<b>Evidence</b> 48:6	<b>families</b> 27:25 28:22	22:1 23:1
<b>entity</b> 57:18 58:14	<b>EXAMINATION</b> 7:11	29:3 30:2,8	24:1 25:1
<b>estab</b> 49:2	<b>exception</b> 10:13	32:22 35:18	26:1 27:1
<b>established</b> 49:22	<b>excessive</b> 23:4	42:15,21	28:1 29:1
<b>establishment</b> 48:17,25	<b>Excuse</b> 23:3 31:16	43:11 49:5, 7,12 50:9,14	30:1 31:1
49:13 51:25	<b>executive</b> 5:13	58:24 59:9, 11,16,23	32:1 33:1
52:3 53:16, 19,20,23	<b>exhibit</b> 24:21,22	60:9 62:20, 22 63:8	34:1 35:1
54:5 57:7, 12,17 58:13	25:4 45:11, 12,18 47:24	64:10,19,23	36:1 37:1
59:2,3,6,10	61:4,7,14	65:13 72:9, 13,17 77:14	38:1 39:1
60:6,10,16	74:12,14	78:23 81:20, 24 84:13	40:1 41:1
62:20,22	79:17	86:10 88:19, 22 93:3	42:1 43:1
63:7 64:18, 22 67:10,20	<b>existed</b> 55:20	<b>family</b> 27:5 35:23	44:1 45:1
68:15,20	<b>expect</b> 7:22	38:18 44:23	46:1 47:1
72:5,14,18	<b>experience</b> 29:16	47:12 59:18	48:1 49:1
73:7,11 75:5	<b>explain</b> 35:20 90:2	60:8,16	50:1 51:1
76:4,14,24	<b>explained</b> 36:4 89:10	61:22,25	52:1 53:1
77:14 78:6, 24 81:21,25	<b>explains</b> 89:18 90:10	64:15 66:21	54:1 55:1
82:3 84:14, 21 86:9	<b>explanation</b> 36:3	67:8 68:19	56:1 57:1
87:20 88:16, 20 89:5 93:3	<b>express</b> 11:12	72:6 73:10, 12,13,15	58:1 59:1
<b>establishment</b> <b>'s</b> 58:25 59:25 94:17		75:6 76:5,7, 10,13,20,23, 25 77:3 78:5	60:1 61:1
<b>establishment</b> <b>s</b> 49:3	<b>F</b>	82:4 83:17	62:1 63:1
<b>Eszter</b> 5:22 7:15	<b>facts</b> 37:2,8	85:2 88:16, 25 89:6 91:5	64:1 65:1
<b>European</b> 22:3,4,15,22	<b>fading</b> 84:18	92:14,23	66:1 67:1
		93:7,10,13	68:1 69:1
		94:8	70:1 71:1
		<b>Farid</b> 4:1,11 5:1 6:1,10 7:1, 25 8:1 9:1 10:1 11:1 12:1 13:1 14:1 15:1 16:1 17:1	72:1 73:1
			74:1 75:1
			76:1 77:1
			78:1 79:1
			80:1 81:1
			82:1 83:1
			84:1 85:1
			86:1 87:1
			88:1 89:1
			90:1 91:1
			92:1 93:1
			94:1 95:1
			96:1,20
			<b>father</b> 79:24 80:3,6 92:9
			<b>February</b> 82:14 96:4
			<b>Federal</b> 6:20 48:6

July 29, 2021

<b>Fida</b> 30:17	<b>first</b> 10:9 25:19 46:19 51:9 67:12 69:23 81:9 93:18	<b>function</b> 17:2,5,12 18:10	38:1 39:1 40:1 41:1 42:1,10 43:1,23 44:1 45:1,22 46:1 47:1,2,5,23 48:1,16 49:1 50:1,17 51:1,2,15,16 52:1 53:1 54:1 55:1 56:1,11 57:1 58:1 59:1,7 60:1 61:1,17 62:1 63:1 64:1 65:1 66:1 67:1 68:1 69:1 70:1 71:1 72:1 73:1 74:1,22 75:1,15 76:1 77:1 78:1 79:1 80:1 81:1 82:1 83:1 84:1 85:1 86:1,5 87:1,9,17 88:1,2 89:1 90:1 91:1 92:1 93:1 94:1 95:1 96:1,20
<b>Fidak</b> 41:21 44:11	<b>five</b> 33:14 36:8	<b>funded</b> 60:17	
<b>files</b> 31:7,9,14, 22,25 32:16 33:17 34:3, 6,11 40:13	<b>five-minute</b> 43:14 74:2	<b>funds</b> 38:22 60:20	
<b>filling</b> 88:5	<b>follow</b> 21:21 22:3, 17	<b>G</b>	
<b>finance</b> 8:7 15:13,14 16:13 17:19 18:16,21,23, 25 19:2,4,7, 9,14,17 20:3 21:14,18,21, 22,24,25 22:10,19,24 23:2,9,12 26:10,16 28:3,24 29:17 30:17 33:8,11,20 37:19 39:15, 18,21 40:24 41:2,6,14 44:5,8,11, 12,14,16	<b>followers</b> 52:19 <b>following</b> 22:21 27:6 31:9,13 <b>follows</b> 6:9,13 <b>form</b> 30:5 81:18 86:25 87:14 <b>formal</b> 15:11 24:13 <b>formed</b> 29:14 30:3 40:19 <b>found</b> 34:11 <b>four</b> 13:24 19:21 36:13 69:22 91:13,16 92:2 <b>four-part</b> 62:3,14 <b>frame</b> 52:16 <b>Freeman</b> 56:14 <b>front</b> 46:23 <b>full</b> 39:21 79:19 <b>fully</b> 11:22 67:9	<b>gain</b> 29:17 <b>Gassan</b> 28:5 37:20 41:3,4,7 <b>gave</b> 36:3 <b>Gaza</b> 13:2 23:21 31:10,15,18 <b>general</b> 14:7 19:24 20:6,8,13, 14,20 54:3 59:4 60:18, 20,22 94:25 <b>generated</b> 61:21 <b>Ghannam</b> 4:1,11 5:1 6:1,10,15 7:1,13 8:1,2 9:1 10:1,19 11:1,6 12:1 13:1 14:1 15:1 16:1 17:1 18:1 19:1 20:1 21:1 22:1 23:1 24:1 25:1,2,12 26:1 27:1 28:1 29:1,10 30:1 31:1 32:1 33:1 34:1 35:1 36:1 37:1	
<b>financial</b> 12:21 13:17, 19,22,24 15:4 18:6 19:18 20:9, 21 22:5,18, 21 34:12 35:17 47:12 49:6,9 53:25 59:5,17 61:23,24 73:10			<b>give</b> 28:14 <b>given</b> 64:15 <b>giving</b> 55:16 <b>goes</b> 28:3,23 35:24 39:19 55:13,19 76:13,23 <b>going</b> 8:12 10:12, 24 15:21 21:7 23:4
<b>financially</b> 4:21			
<b>financing</b> 14:7			
<b>finish</b> 9:3,5			

July 29, 2021

28:16 32:11 42:4 47:23 54:15 63:2 66:19 67:23 68:17 86:2 88:3 95:21 <b>good</b> 4:2 7:13 42:9 49:9 <b>govern</b> 42:12,14 68:15 89:19 <b>governing</b> 42:20 <b>government</b> 78:14 <b>Governor</b> 5:14 <b>Governorate</b> 78:7 <b>governs</b> 40:13 60:7 64:18,22 65:12 72:4 88:15 89:4 <b>Gresser</b> 5:23 <b>ground</b> 7:21 <b>group</b> 29:14,20 30:14,16,21 33:10 36:8 37:15,18,23 40:19,25 41:19 42:11 <b>guidance</b> 88:19	<b>half</b> 42:4 <b>Hamasha</b> 30:19 44:9 <b>Hamdan</b> 31:2 32:15, 21 <b>handwriting</b> 83:8 <b>handwritten</b> 82:11 <b>happened</b> 52:10 84:22 <b>happy</b> 51:5 <b>he'll</b> 28:14 <b>head</b> 9:11 49:11, 20,23 50:5, 6,8,11 51:24 57:12 93:12 94:23 <b>headed</b> 52:24 <b>health</b> 59:22 60:8 <b>hear</b> 33:4 43:7 50:12 51:10 85:16 88:12 <b>heard</b> 46:18 48:10 <b>held</b> 4:7 19:19 63:13 <b>highest</b> 12:18,19 <b>Hmaid</b> 41:21,24,25 44:11 <b>hold</b> 15:15 21:5 24:5 45:14 50:21 51:17, 19,20	<b>hospital</b> 82:9 84:25 89:3 <b>hour</b> 42:4 <b>hours</b> 36:13 56:24 <b>household</b> 93:12 <b>housekeeping</b> 6:16 <b>Hypothetical</b> 87:15  <b>I</b>  <b>ID</b> 69:19,24 <b>identificatio n</b> 24:24 45:21 61:10 74:17 <b>IMF</b> 22:13,16,22 <b>implement</b> 89:24 90:3 <b>implemented</b> 65:3 <b>implementing</b> 64:21 <b>implements</b> 89:16,25 <b>importance</b> 78:12 <b>important</b> 8:24 9:9 92:21 <b>imposed</b> 54:17 <b>imprisoned</b> 38:12 <b>incident</b> 80:14 81:3, 11,12,13 82:2,6 83:3, 19 90:13	<b>incidents</b> 82:21 <b>include</b> 60:12 91:20 <b>included</b> 34:3 <b>includes</b> 82:19 91:23 94:2,10 <b>including</b> 27:8 30:4 <b>income</b> 60:22 <b>independent</b> 53:24,25 57:18 58:14 <b>indicate</b> 5:19 78:13 92:22 <b>indicated</b> 90:17 <b>indicates</b> 78:4 92:13 94:21 <b>indirectly</b> 26:22 27:4 44:22 60:24 <b>indiscernible</b> 51:7 <b>individual</b> 26:23 27:5 <b>individual's</b> 27:6 <b>individuals</b> 44:24 64:16 <b>industrial</b> 15:23 16:3, 21 17:23,24 18:5 <b>information</b> 29:18 30:6 39:19 62:2 67:5,18 69:5,8,10, 13,14,20 77:12 79:7 80:10 81:16,
<b>H</b>			
<b>H-M-A-I-D</b> 41:25 <b>Hadine</b> 47:14,21 <b>Hafez</b> 8:2			

July 29, 2021

24 82:12,19, 25 88:24 89:9 91:8 92:7 93:24 94:8,14,22 96:3 <b>informations</b> 35:16,17,19 <b>injured</b> 38:16 49:12 50:10,15 58:24 60:16 72:13,18 77:14 78:23 81:20,25 84:13 88:20 93:3 <b>inside</b> 18:15 28:2, 23 49:22 52:21,22 <b>institute</b> 16:23 50:13 <b>instruct</b> 54:15 55:8 56:11 57:21 <b>instructs</b> 9:22 <b>interested</b> 4:22 <b>international</b> 22:10 <b>international</b> <b>ly</b> 22:2 <b>interpret</b> 95:5 <b>interpreter</b> 6:5,11 13:6, 7 14:5 15:20,21 16:2,10,11 17:8,11 22:6,8 24:7, 8 28:9,10 29:2,5,7,24 31:12 32:8,9	34:7,8,21 35:6,7 37:10 41:9,10 42:25 43:2, 5,6 47:15, 19,20 50:16, 18,19 51:3 52:14 61:16 62:9,10,25 63:2 65:17, 20 80:22 82:24 84:16, 17 88:13 95:4 <b>interpreting</b> 61:16 <b>Intifada</b> 77:7,10,17, 19 <b>Intissar</b> 49:14 52:25 <b>investigate</b> 84:23 <b>investigates</b> 76:5 82:4 <b>investigation</b> 34:17,18,20 35:2,10 75:10,13 76:6 77:9 78:13 81:9, 14 90:4 93:25 94:7 96:4 <b>investigative</b> 75:18,24 <b>investigator</b> 76:3 77:2 82:5 83:10, 12 84:2,20 88:23 89:16, 20 92:15 94:6,23 <b>investigator'</b> <b>s</b> 92:16 94:15 <b>investigators</b> 88:18	<b>Islamic</b> 12:25 <b>Israeli</b> 86:18,22 <b>issued</b> 5:14 44:20 78:22 <b>issues</b> 37:3,8 <b>item</b> 57:19 58:14 <hr/> <b>J</b> <hr/> <b>J-A-B-E-R-N</b> 30:13 <b>Jabern</b> 30:9 36:16, 17 <b>Jadalahasan</b> 47:21 <b>JD</b> 48:2 <b>JD1101</b> 45:3 <b>JD113</b> 61:13 72:22 <b>JD114</b> 68:22 <b>JD117</b> 61:14 69:4 <b>JD12</b> 45:16 46:3, 16 47:25 <b>JD249</b> 45:17 46:17 <b>JD559</b> 45:3 <b>JD977</b> 74:20 <b>JD980</b> 93:15 <b>JD990</b> 74:21 <b>JD9900</b> 74:20	<b>job</b> 23:8 <b>joined</b> 52:6 <b>Jordan</b> 7:5 <b>judge</b> 55:24 56:13 58:3 <b>July</b> 4:12 <b>June</b> 24:23 25:6 <b>jurisdictiona</b> <b>l</b> 38:10 52:17 53:9 54:10, 14 55:10,23 56:2 57:22 58:19 <hr/> <b>K</b> <hr/> <b>K-H-A-L-E-B</b> 30:12 <b>Karnei</b> 82:15 83:22 84:3 94:4,11 <b>Khaleb</b> 30:9 36:17 <b>Khamis</b> 13:12 <b>killed</b> 38:16 86:17 <b>kind</b> 59:15 75:21 <b>kinds</b> 59:14 60:2 <b>know</b> 7:21 9:15 10:5 11:3 42:23 53:11, 22 76:20 <b>knowledge</b> 27:19,23 28:20 39:9, 13,21
--	---	---	--

July 29, 2021

<b>knowledgeable</b> 27:12,16 39:2,6	<b>Liberation</b> 12:5,13	63:23 68:3 69:17 75:17 78:16 81:19	54:11 76:7 77:3
<hr/>	<b>license</b> 13:17,18	<b>looks</b> 93:6	<b>makes</b> 45:12
<b>L</b>	<b>licenses</b> 13:13,14,16	<b>loses</b> 63:15,18 85:5 86:11 87:5,21 95:12	<b>making</b> 33:18 34:2 55:15
<b>language</b> 11:13,16	<b>lieu</b> 5:11	<b>loss</b> 76:8 90:16 93:8	<b>male</b> 51:7
<b>lasted</b> 36:12	<b>life</b> 63:6,10,14, 15,18 85:5 86:11 87:5, 22 88:9 90:17 95:12	<b>lost</b> 63:5,9,14 88:8	<b>man</b> 32:21
<b>later-</b>	<b>light</b> 8:23	<b>lot</b> 10:24 69:5	<b>Manatek</b> 30:23,24
<b>produced</b> 45:5	<b>limitation</b> 54:17 55:2	<b>Louis</b> 23:17	<b>manner</b> 5:18
<b>law</b> 42:18,19,24 43:10 60:7, 11,12 62:21 63:7 64:17, 22 65:2,5, 11,12,14,18 66:20 70:4 72:4 73:6,9, 22 85:12,23 86:8,16 87:4,19 88:9,11,15, 20 89:4,11, 17,19,23,25 90:12,17 95:11,16,18, 20	<b>listed</b> 16:17 21:7 31:4 32:13 37:23 91:17	<hr/>	<b>marked</b> 24:23 45:20 61:9 74:16
<b>laws</b> 40:13 42:11, 17 60:10 68:15 72:19 87:13	<b>lists</b> 33:25	<b>M</b>	<b>marking</b> 24:20 45:10
<b>led</b> 84:11	<b>little</b> 28:14 73:25	<b>madam</b> 32:9	<b>married</b> 65:8 91:20
<b>left</b> 78:16	<b>live</b> 8:2 49:8	<b>made</b> 26:21,24 27:3,24 28:21 29:3 38:11,20,21 39:20 44:21 55:3,4,14, 19,24 93:9, 11	<b>martyr</b> 35:23 61:25 62:23,24 63:5 64:15 65:24 66:4 72:8,12,17, 23 73:3,9,20 76:22 77:6, 10 79:17 83:16,17 84:22 86:18, 23 87:3,12 88:10 90:9, 11,15 92:18, 21,23,24,25 93:5 94:9 95:2
<b>legal</b> 4:18,24 30:4,18 33:3,6,11 41:20 44:11	<b>local</b> 10:12	<b>Mahmoud</b> 62:3,14,17 66:13 70:21, 22,25 71:3, 12,22 72:11, 25 73:3,17 79:10,13,20 80:5,7 83:5, 13	<b>martyr's</b> 66:21
<b>level</b> 12:18,19	<b>located</b> 4:18 7:5	<b>main</b> 20:12 23:8	<b>martyrdom</b> 71:22 83:21
	<b>location</b> 38:14 81:10 82:20 83:2, 13 90:13	<b>make</b> 8:21 38:23	
	<b>long</b> 19:19 21:2 29:16 36:11		
	<b>look</b> 34:10 93:15		
	<b>looked</b> 36:23		
	<b>looking</b> 48:15 56:5		

July 29, 2021

84:7,10,15, 23 85:3,4 86:6,8,19 88:6 90:7,18 94:3,11 95:2,3,10,25 96:2 <b>martyred</b> 72:10 <b>martyrs</b> 28:2,22 29:5,6 30:2, 8,21,25 31:4,7,20 32:4,18,22, 23 33:13 35:13,18 40:3,11,15, 17,20 42:13, 15,22 43:11 47:11 48:16, 20,24 49:5, 11,13 50:9, 15 51:25 52:4,20 54:4 57:6,13,17 58:12 59:9, 12 61:22 63:8,21 64:10,23 65:13 67:10, 20 68:16 72:5 73:7,12 75:6 76:4, 14,24 78:6 82:3 86:9 87:21 88:16 89:5 <b>martyrs'</b> 58:24 59:9, 16,23 60:9, 15 62:20,22 64:19 72:13, 17 77:13 78:23 81:20, 24 84:13 88:19 93:2	<b>master</b> 11:8 <b>master's</b> 12:20,24 14:19,21,23 <b>matter</b> 4:14 29:14, 19 <b>matters</b> 42:15 63:4 <b>mean</b> 12:4 53:20 66:2,16 67:4,11,17 68:12 70:7 77:18 80:5 81:12 84:8 88:7 94:20 <b>means</b> 64:13 66:18 67:18,21 68:13,16 70:9 <b>meant</b> 88:8 <b>measure</b> 6:16 <b>mechanism</b> 40:8 90:2,5 <b>mechanisms</b> 40:14 42:12 <b>meet</b> 33:9 37:15, 21 44:7,15 76:15 <b>meeting</b> 36:12,15 37:14 <b>meetings</b> 33:16,23 35:11 36:5, 11 <b>member</b> 15:17 16:8, 18,22 17:2, 4,5,13,16, 20,25 27:5	38:18 93:13 <b>members</b> 37:23 44:23 92:23 93:7, 10,13 <b>mentioned</b> 21:10 33:3 39:14 41:3, 18 44:3 60:13 67:15 75:17 81:17 85:9 86:15 87:3,19 91:19 92:15 95:9,17,19 96:3 <b>met</b> 36:8 37:18 44:3,9 76:25 <b>middle</b> 68:3 <b>minister</b> 8:7 15:13 19:7,9,13,17 26:10,16 28:3 36:14 49:14 52:24 <b>minister's</b> 57:14 <b>Ministers</b> 57:15 <b>ministries</b> 19:5 <b>ministry</b> 18:21,23,25 19:3 20:3 21:14,18,20, 22,23,25 22:18,24,25 23:9,11 28:24 29:16 30:17 33:8, 10,12,20 37:19 39:15, 18,20 40:24 41:2,6,14 44:4,8,10, 12,14,16	50:6,9 52:23,24 53:2,15 79:3 <b>minor</b> 91:21,23 <b>mispronounce</b> 32:12 <b>missing</b> 85:21 <b>misunderstood</b> 95:7 <b>Mitch</b> 37:20 41:4 <b>Mitchell</b> 5:25 7:7 <b>modified</b> 42:19 <b>Mohamed</b> 13:12 <b>Mohammad</b> 30:19 44:9 <b>month</b> 25:21 69:19, 24 70:11 <b>monthly</b> 70:5,17 71:13,16,18, 20 <b>morning</b> 4:3 7:13 <b>Morocco</b> 13:11 <b>mother</b> 79:24 92:9 <b>movement</b> 77:20 <b>multiple</b> 15:17 <b>Muslim</b> 47:13 <hr/> <b>N</b> <hr/> <b>name</b> 4:16 5:20 7:14,23,25
--	--	---	--



July 29, 2021

32:12 41:23 47:21 62:3, 11,14 66:10, 13,16 69:19, 25 70:8 79:9,20,23 <b>Nasser</b> 30:22,24 32:20 <b>Nasser's</b> 31:19 <b>National</b> 38:16 <b>nature</b> 38:14 <b>need</b> 10:4,14 11:2 56:13 64:17, 25 72:7 73:10,13,18 76:8 77:3 92:14 93:6, 14 <b>needed</b> 23:11 90:4 <b>needs</b> 49:9 59:5,18 68:19 73:16 92:24 <b>never</b> 48:10 <b>nodding</b> 9:11 <b>Notary</b> 6:12 96:25 <b>note</b> 52:12 <b>notice</b> 24:22 25:6 26:3 38:4 44:20 53:8 54:9,20 55:11 56:19 58:20 <b>number</b> 5:14 25:5 38:7 40:7	45:12 65:14, 18 69:25 74:12 91:10, 25 <b>numbers</b> 45:3,16 46:16 47:25 61:13 74:20 <hr/> <b>O</b> <hr/> <b>oath</b> 5:11,12 8:17 <b>object</b> 9:21 23:4 87:14 <b>objection</b> 9:25 14:3 22:12 28:4,5 31:17 34:16 50:4 52:12, 15 53:7,21 54:7 57:20 58:17 60:3 85:10,19 86:24 <b>objections</b> 5:18 <b>obtain</b> 14:15,22 29:17 <b>obtained</b> 12:20 <b>occupation</b> 8:4,6 63:11, 12,13 77:20 85:6,7,8 86:12,13,14 87:7,8,23, 24,25 95:13, 15,16 <b>office</b> 78:14 <b>officer</b> 7:2 <b>official</b> 6:5	<b>Okay</b> 9:18 11:4 46:10,24 48:14 73:23 86:4 90:19 <b>Omal</b> 44:13 <b>once</b> 23:14 <b>one</b> 6:15 9:2 15:22 19:3 49:2 57:13 64:6 71:8 76:9 80:12 84:5 88:4 92:4 <b>ones</b> 16:16 21:6, 10 31:12 <b>operating</b> 58:25 <b>operation</b> 83:22 84:7, 10,15 88:7 90:7 94:4,11 <b>order</b> 5:13 54:16 55:25 <b>organization</b> 12:6,13 17:13 18:3, 20 31:25 35:13,24 <b>organization's</b> 17:6,17,21 <b>organizations</b> 15:18,19 16:8,16 19:4 <b>organized</b> 46:12,20 <b>organizes</b> 18:10 <b>original</b> 46:2 61:6	<b>originals</b> 47:25 <b>outcome</b> 4:22 <b>outside</b> 18:15 24:11 28:2,23 30:25 49:21 52:16,21 53:8,9 54:8, 9,20 55:9,11 56:17,18 57:22 58:18, 19 <b>overseeing</b> 39:17 <hr/> <b>P</b> <hr/> <b>PA</b> 12:9 15:8, 12,16 16:9, 17 17:15,19 20:15 21:3 26:6,9 27:13 39:3 49:16, 22 53:3,4,6, 14,20,24 54:25 57:19 58:15 78:24 <b>page</b> 8:14 48:15 61:5 66:22, 25 68:4 69:4 79:5,6 81:9 90:20 91:19 <b>pages</b> 26:18 <b>paid</b> 64:25 65:9 <b>Palestine</b> 8:2 12:5 18:11,14 23:21 <b>Palestinian</b> 12:4,9,13 15:18 16:5,
---	--	---	--



July 29, 2021

13 18:19 19:25 20:6 22:4 23:23 24:3 49:3 57:15 60:24 76:23 78:19 79:2 <b>pandemic</b> 6:18 8:24 <b>paper</b> 46:6,20 <b>pardon</b> 7:18 26:23 32:7 33:12 49:12 78:18 <b>parentheses</b> 79:24 <b>parents</b> 91:23 <b>part</b> 34:13,14 47:18 50:20 52:7,22 53:3,4,6,12 78:24 79:6 80:9 <b>Participants</b> 4:4 <b>participating</b> 5:5 <b>particular</b> 21:13,17,24 <b>parties</b> 5:16 6:25 <b>parts</b> 34:12 <b>party</b> 4:20 <b>past</b> 21:8 <b>Patton</b> 6:2 41:7,17 <b>pause</b> 7:19 <b>payment</b> 33:19 38:6, 11,18,20,21,	23 66:20 68:18 93:11 <b>payments</b> 26:21,24 27:3,8,24 28:7,21 29:3 39:20 44:21 54:23 55:3, 4,7,14,18 56:21,23 70:17 71:2 73:5,21 93:9 <b>pending</b> 10:8 50:23 <b>people</b> 31:4,6 64:16,25 91:8,17 93:5 <b>percent</b> 68:14,18 <b>percentage</b> 68:6,7,9 <b>period</b> 28:8 55:5 63:19 90:24 <b>periodic</b> 10:3 <b>person</b> 5:12 9:2 27:11,15 30:4 32:13 38:11,19,25 39:5 63:5,9, 15,18 65:8 66:18,19 72:10 76:18 79:16 84:11 85:4 86:10, 17 87:5,12, 21 88:5,8,10 90:8,11 91:20 93:8 95:11,12 <b>personal</b> 35:16 62:2 79:7 <b>persons</b> 64:17	<b>Ph.d.</b> 12:22 13:4, 10 <b>phonetic</b> 18:19 30:23 44:13 47:14, 22 <b>physically</b> 5:7 <b>place</b> 8:23 80:13 81:3 <b>plaintiffs</b> 5:24 7:16 <b>please</b> 4:25 5:19 7:23 9:3,15 10:5 11:3 17:10 24:19 29:23 30:11 37:5 38:3 41:23 43:13 45:9 46:2 52:11 61:3 68:22 69:4 96:7,16 <b>PLO</b> 4:15 12:14 15:9 24:6, 11,13,16 26:12,15 27:17 39:7 49:19,20,21, 24 50:6,22 51:5,17,19, 20 52:2,5,8 53:13 54:6, 25 55:16 57:7 <b>PO</b> 54:24 <b>point</b> 42:3 91:22 <b>population</b> 60:25 77:20 <b>portion</b> 34:13 67:23	<b>position</b> 15:11 18:6 19:16,20,23 20:11 21:12 24:13 31:19 32:4 50:2 51:19 56:9 57:25 <b>positions</b> 21:9 31:3 50:21 <b>possible</b> 29:18 <b>potential</b> 10:15 <b>pre-printed</b> 81:18 <b>predicate</b> 55:24 <b>preparation</b> 32:24 36:19 37:16 40:9 41:15 44:16 <b>prepare</b> 29:11 39:23 40:5 48:22 <b>prepared</b> 35:21 40:6 45:4 47:10 81:19 <b>prepares</b> 76:18 <b>preparing</b> 43:24 75:16 <b>present</b> 5:7 23:25 36:15 41:8, 17 49:4,6 82:8,25 <b>presented</b> 25:15 36:24 59:6 <b>prevent</b> 49:8 <b>previous</b> 42:19
---	---	---	--

July 29, 2021

<b>previously</b> 51:21 60:13 85:9 86:15 87:4 95:17, 19	<b>Public</b> 6:12 96:25	60:5 69:16 80:15,25 86:3,25 87:15 88:3, 14 95:6,22, 23,24	61:12 70:3 71:13,16,20 72:3 74:19
<b>printouts</b> 89:22	<b>pull</b> 24:19 45:9 61:3	<b>questioning</b> 23:5	<b>receives</b> 88:25
<b>prison</b> 63:15,16,17	<b>purpose</b> 80:17 81:6	<b>questions</b> 6:7 7:17 9:4,10,21 10:15 11:22, 25 42:7 45:5 54:22 55:2, 17 56:22 96:6	<b>receiving</b> 70:16 71:2 73:5,20 89:22
<b>privilege</b> 10:16 18:6	<b>pursuant</b> 5:13 6:19,24 26:3 85:12, 22,23 86:8, 16 87:4,19 88:9 95:17, 19	<b>quick</b> 28:25 73:24	<b>recess</b> 43:18 74:3,7
<b>privileges</b> 18:7	<b>purview</b> 21:15,16		<b>recipient</b> 38:18
<b>Procedure</b> 6:21	<b>put</b> 18:5 37:15 46:22 89:4		<b>recognize</b> 25:11 47:7 74:22
<b>proceeding</b> 4:5 6:23		<b>R</b>	<b>recollection</b> 37:2,7
<b>proceedings</b> 5:2 7:19	<b>Q</b>		<b>Recommendatio ns</b> 93:19
<b>process</b> 8:13	<b>Qalqilya</b> 78:8,15 82:15	<b>Ramallah</b> 8:3 31:8	<b>record</b> 4:4,9 5:3,21 7:24 8:21 25:5 43:13, 16,20 58:2, 5,7,9 73:25 74:5,9 96:7, 9,17
<b>produced</b> 38:9 42:19, 20 44:20 46:15 75:4	<b>qualification</b> 90:16	<b>re-ask</b> 34:23 51:11 58:11 86:2	<b>recorded</b> 4:6,7,11
<b>production</b> 45:2,16 46:16 47:25 61:13 74:19	<b>qualified</b> 72:20 90:14	<b>read</b> 25:18 26:17	<b>records</b> 48:5
<b>professional</b> 13:14 14:25	<b>question</b> 9:6,15,17, 18,23,24 10:7,8,18 13:5,8 17:7 26:25 28:16, 25 29:23 34:24 35:8,9 37:4,11 41:12 43:3, 4,8,9 47:4 50:20,22 51:9,12 54:8,12 55:6,13,22 56:3,5,16 57:2,4 58:11,18,21	<b>reads</b> 80:9,13 81:3 83:21 91:4	<b>refer</b> 12:3
<b>program</b> 14:19		<b>reason</b> 11:17,20 27:8 38:21 54:22 55:13 67:12,13	<b>reference</b> 87:13
<b>programs</b> 59:22		<b>reasons</b> 11:19,24 55:3,18,19	<b>referring</b> 12:8,12 51:4 62:12 75:22
<b>prove</b> 82:9		<b>reassert</b> 58:17	<b>refers</b> 48:16 90:7
<b>provide</b> 59:25		<b>receive</b> 12:23 66:19 68:17 88:18 89:7,9,14,21	<b>reflected</b> 38:6
<b>provided</b> 51:2 65:17 66:10 77:13 80:16 84:25		<b>received</b> 45:13,15	<b>reflecting</b> 44:21
<b>provides</b> 59:11,16,21 91:7			

July 29, 2021

<b>refresh</b> 37:2,7	<b>repeat</b> 13:5,7 17:9	<b>representing</b> 7:15 37:19	64:10 65:24
<b>regarding</b> 26:21 27:3	28:13,16	<b>request</b> 4:8 10:7	67:14 68:10
29:11 35:17	32:8 37:4	76:6,11,12	70:13 71:23
36:19 39:24	41:11 43:2,7	<b>requested</b> 29:19 33:18	75:19 78:17
40:4,14	47:4 51:8	34:2,4 39:25	92:5 95:21
42:12 47:13, 19 61:23	80:24 82:22	<b>require</b> 23:10	<b>robbery</b> 87:12
<b>registered</b> 13:11	84:18 87:18	<b>resisting</b> 86:13 87:7, 24	<b>Roberta</b> 4:23 6:6
<b>regulate</b> 24:10	88:13	<b>respect</b> 27:12,16	<b>room</b> 5:8
<b>regulates</b> 18:14	<b>repeated</b> 43:4,9	38:6,11,19	<b>rough</b> 96:12,14
<b>regulating</b> 19:18	<b>rephrase</b> 9:16	39:2,6	<b>rows</b> 69:17,21
<b>regulations</b> 72:19 89:4	<b>report</b> 19:8,12	<b>respond</b> 9:10	<b>rule</b> 6:20,24 48:5 91:25
<b>regulatory</b> 16:23	21:19 24:15	<b>respondent</b> 15:22 43:6 95:6	<b>rules</b> 6:20 7:21 10:12 48:6
<b>rehabilitatio n</b> 49:7 59:22	34:17,18,20	<b>responsibilit ies</b> 19:15 23:10	<hr/> <b>S</b> <hr/>
<b>relate</b> 18:21	35:2,11,25	<b>responsible</b> 31:6,21,25 32:16	<b>Sadeq</b> 62:3,14,17 70:22 71:3, 21 72:11,25 79:10,12 80:7 83:4,13
<b>related</b> 4:20 54:12	57:9 75:25	<b>result</b> 63:10,17,18 71:21 76:8 85:6 86:12 87:6,22 92:25 93:8 95:13,14	<b>Sala</b> 47:14,21
<b>relates</b> 56:4	76:2,18	<b>review</b> 12:17 36:18, 22	<b>Salaman's</b> 32:3
<b>relating</b> 37:3,8 56:22	77:9,15	<b>reviewed</b> 36:23 37:7 72:18	<b>salaries</b> 44:10
<b>relationship</b> 18:22 92:5, 18,20,22 93:4	78:22 81:9, 15 88:6	<b>right</b> 8:14 10:9 28:18 33:4 43:12,25 48:18 51:11 62:4 63:25	<b>salary</b> 70:3
<b>released</b> 63:16	92:16 93:25		<b>Salim</b> 30:22,23 32:6 37:20 41:4
<b>relevant</b> 55:5	94:15 96:4		<b>Saravese</b> 30:20
<b>remember</b> 10:18	<b>reporter</b> 4:23 5:4		<b>Satal</b> 18:18
<b>remote</b> 4:10,17 5:2	8:19 15:25		
<b>remotely</b> 5:9,13 6:17 8:23	29:9 30:10		
	31:11 41:22		
	47:17 50:7		
	65:15 71:10		
	77:11 80:19		
	89:12 92:3		
	96:13		
	<b>reporting</b> 5:8,19		
	<b>reports</b> 35:21 75:18		
	<b>represent</b> 5:23 47:12, 24		
	<b>representatio n</b> 54:11 55:8		
	<b>representativ es</b> 30:5 39:16		

July 29, 2021

<b>save</b> 10:13	67:13 68:7	<b>Shatsky-jd12</b> 38:8	<b>simply</b> 73:18
<b>saying</b> 85:12	69:18 74:25	<b>Shatsky-jd534</b> 38:9	<b>single</b> 65:8 91:22
<b>says</b> 62:3,13 64:9 65:23 68:9, 24 72:22 77:6 78:7,18 79:6,9,19,24 82:14 91:10, 13 92:4	<b>seek</b> 81:25	<b>Shekel</b> 70:6 71:8	<b>sister</b> 79:25 92:10
<b>scale</b> 64:7,10,20	<b>seeks</b> 90:8	<b>Shekels</b> 71:14,17	<b>situations</b> 67:6
<b>science</b> 12:21 13:19, 24	<b>separate</b> 18:24 19:3,6 53:16,19	<b>Shomron</b> 82:15 83:22 84:3 94:4,11	<b>size</b> 58:23
<b>sciences</b> 13:18 15:4	<b>separated</b> 53:15	<b>shoplifting</b> 86:21	<b>Slay</b> 32:20
<b>scope</b> 53:8,9 54:8, 9,13,18,20 55:10,11 56:2,18,19 57:22 58:18, 20	<b>sequences</b> 63:12	<b>short</b> 42:5	<b>social</b> 34:17,20 35:2,10,19, 24 52:23 53:2,15 75:7,8,9,17, 24 76:15,17, 21 77:2,9 79:3 81:14 82:5 83:10, 11 84:2,20 88:18,23 89:15,20 90:4 92:15 93:25 94:6, 7,15,23
<b>screen</b> 11:3 24:19 45:9 46:5,25	<b>sets</b> 64:20	<b>shortly</b> 90:25	<b>solder</b> 86:22
<b>scroll</b> 38:3 46:2	<b>Settlement</b> 82:15 83:22 84:4 94:4,12	<b>shot</b> 86:22 87:11	<b>son</b> 72:7 73:19
<b>search</b> 75:7,8,13	<b>settlements</b> 84:5	<b>show</b> 10:24	<b>Sounds</b> 42:9
<b>second</b> 22:7 91:22	<b>seven</b> 91:8,17	<b>shown</b> 25:23	<b>source</b> 38:22 60:19
<b>section</b> 63:24 66:7, 11,24 68:4, 24	<b>Shatsky</b> 4:14	<b>shows</b> 70:15 71:7	<b>space</b> 41:25
<b>sections</b> 89:17 90:2	<b>Shatsky-jd00012</b> 45:19	<b>Shukri</b> 19:11	<b>speak</b> 8:25 11:6, 10,12,15 32:23 41:5, 13 43:25
<b>sector</b> 18:5	<b>Shatsky-jd00113</b> 61:8	<b>sibling</b> 91:23	<b>speaking</b> 11:9 24:8 41:10 43:24 47:15 50:19
<b>see</b> 11:2 24:25 25:19 45:22 47:2,5 61:17	<b>Shatsky-jd00117</b> 61:9	<b>siblings</b> 91:24	
	<b>Shatsky-jd00249</b> 45:20	<b>signature</b> 93:18,22 94:16	
	<b>Shatsky-jd00977</b> 74:15	<b>signatures</b> 93:16	
	<b>Shatsky-jd00990</b> 74:16	<b>significance</b> 78:2,10 92:11	
	<b>Shatsky-jd1</b> 38:7	<b>Simek</b> 38:2 45:8,25 66:22 67:25 69:3	
	<b>Shatsky-jd10</b> 38:8	<b>similarly</b> 45:4	

July 29, 2021

51:10 62:10 <b>speaks</b> 9:2 <b>specified</b> 27:7 44:25 <b>speculation</b> 87:2,16 <b>spell</b> 30:11 <b>spoke</b> 34:19,25 35:3,9,15 75:15 <b>Squire</b> 6:2 41:7,17 <b>stamped</b> 45:19 61:8 74:15 <b>start</b> 9:4 <b>started</b> 14:20 85:11 <b>state</b> 6:12 7:23 <b>statement</b> 4:25 94:3,10 <b>states</b> 38:17 91:19, 22 <b>stating</b> 5:20 <b>stationed</b> 23:19 <b>stipend</b> 68:24 69:20 71:6,13 <b>stipulate</b> 6:25 48:4 <b>stipulation</b> 48:8 <b>stopping</b> 42:3 <b>Street</b> 4:19 <b>strong</b> 18:22	<b>studying</b> 12:22 13:3,9 14:20 <b>sub-</b> <b>accountant</b> 20:19 <b>subdivision</b> 54:2 <b>subdivisions</b> 21:18,22 <b>submissions</b> 88:22 <b>submits</b> 76:6,11 <b>submitted</b> 83:16 <b>Subscribed</b> 96:21 <b>subsection</b> 80:18 81:2,7 82:12 83:18 <b>subsections</b> 80:12 <b>Subsequent</b> 44:19 <b>substitute</b> 18:18 <b>Sula</b> 30:22,24 <b>support</b> 4:18,25 49:4,6 59:11,14,15, 17 60:2 61:24 72:6,9 <b>supporting</b> 67:22 <b>supposed</b> 57:13 89:24 <b>sure</b> 8:21 32:9 33:18 34:2 76:7 77:3 91:3 <b>sworn</b> 6:6,11 96:21	<b>synonyms</b> 25:17 <hr/> <b>T</b> <hr/> <b>tab</b> 24:19 45:9 61:3 <b>table</b> 64:4,7 68:23 69:6 91:5 <b>take</b> 10:3,9,14 42:8 43:13 51:13 56:13, 20 57:3 73:24,25 <b>taken</b> 6:22 7:4 8:10 43:18 74:3,7 <b>taking</b> 8:22 42:20 43:10 60:8 65:13 <b>Tarek</b> 30:18 <b>taught</b> 13:23 <b>taxes</b> 60:23 <b>teach</b> 13:19,21 14:6 <b>team</b> 30:3,5 41:19 <b>technician</b> 4:17 <b>tell</b> 46:13 <b>telling</b> 46:19 <b>terminated</b> 67:24 <b>terms</b> 12:2	<b>terrorism</b> 38:13,15,16 <b>testified</b> 6:13 <b>testify</b> 11:18 15:8 26:6,8,12,14 29:14 <b>testifying</b> 8:17 <b>testimony</b> 26:20 27:2 38:5 <b>Thank</b> 7:10,14 9:20 12:16 29:8 43:22 48:11 61:6 68:9 <b>things</b> 56:17 59:8 <b>think</b> 11:21 46:12 48:7 56:9 58:2 75:11, 12 <b>thought</b> 50:18 <b>three</b> 35:16 36:13 56:22 63:19 93:16 <b>Thursday</b> 4:12 <b>time</b> 4:13,23 9:2 10:25 23:10 28:14 29:16 43:16,17,20, 21 46:19 51:18 52:16 55:2,5 58:5, 6,9,10 63:20 74:5,6,9,10 90:23,24 96:9,10 <b>times</b> 12:3 23:24
--	--	---	---

July 29, 2021

33:9,14 36:9 <b>title</b> 8:5,7 21:6 31:23,24 32:6,10,14 42:23 51:20, 23 <b>titled</b> 64:7 69:19 <b>titles</b> 15:15 24:5 49:15,19 51:17 <b>today</b> 4:12 7:14, 17,22 8:20 10:25 11:18, 22 26:2 69:12 75:16 96:6 <b>today's</b> 6:21 29:11 39:23 <b>tomorrow</b> 7:18 <b>top</b> 66:24 79:6 91:4,19 <b>topic</b> 26:20 27:2, 12,16,20,23 28:20 29:12 36:19 37:3,9 38:3,5 39:2, 6,10,13,22, 24 40:4,5,6, 18 41:14,15 43:25 <b>topics</b> 26:18 40:15 42:13 <b>training</b> 89:7,14,21 <b>transcribed</b> 9:12 <b>transcribing</b> 8:20	<b>transcript</b> 56:6 <b>transferred</b> 52:20 <b>translate</b> 6:6 52:13 <b>translated</b> 6:8 25:16 80:15,21 85:14 <b>translates</b> 52:14 <b>translation</b> 14:3 22:13 25:9 28:6 31:17 34:16 35:5 46:3 50:5 75:12 85:11,20 <b>true</b> 90:6 <b>truthfully</b> 11:18 <b>try</b> 9:15 11:4 29:15 <b>trying</b> 46:8 87:9 <b>turn</b> 77:5 79:5 90:19 <b>two</b> 34:12 48:9 68:5,7 <b>two-plus</b> 56:24 <b>type</b> 65:24 72:23  <hr/> <b>U</b> <hr/> <b>U.S.</b> 4:18,24 <b>U.S.A.</b> 20:25 <b>Umar</b> 30:18	<b>understand</b> 8:16 9:14 10:21 11:14 12:6,10,14 22:14 23:13 25:22 36:7 47:18 53:5 59:8 60:5 86:3 87:10 89:13 <b>understanding</b> 51:4 <b>understood</b> 9:7,18,25 88:21 <b>Union</b> 22:4,15,22 <b>United</b> 38:17 <b>Universiti</b> 13:12 <b>university</b> 12:25 13:20, 22,23 14:13 <b>updated</b> 67:19 <b>upper</b> 78:16,17 <b>USAID</b> 23:14,16,18, 23 <b>UTC</b> 4:13 43:17, 20 58:6,9 74:5,9 96:9  <hr/> <b>v</b> <hr/> <b>value</b> 68:6 <b>verbally</b> 9:10 <b>verification</b> 94:22 <b>verifies</b> 94:5	<b>verify</b> 35:8 93:23 <b>verifying</b> 94:2 <b>versus</b> 4:15 <b>video</b> 4:10,17 6:22 <b>VIDEOGRAPHER</b> 4:2 43:15,19 58:4,8 74:4, 8 96:8 <b>Vincze</b> 5:22 6:14 7:10,12,15 17:7 24:18 25:4,10 28:15,25 29:6,8,22 32:7 34:23 35:4 38:2 42:6 43:12, 22 45:8,25 46:6,10,14, 22 48:3,11, 14 50:11,16, 24 51:8 54:19 55:12 56:8 57:24 61:2,11 65:16,22 66:22 67:25 68:21 69:3 73:23 74:11 75:14 80:24 82:22 85:15, 18,25 91:3 96:5,11 <b>visited</b> 78:5 <b>visits</b> 35:23 <b>voice</b> 51:7 <b>Vyskocil</b> 55:24
---	---	---	--

July 29, 2021

<b>W</b>	16:22 17:16, 24 21:9,13, 25 22:15,23, 25 23:16,20 24:12,15 30:3 33:7 60:15 72:4 89:19 90:3 <b>worked</b> 20:19 23:14, 23 24:2 40:14 <b>worker</b> 35:25 76:16, 17,21 77:2 <b>working</b> 19:23 20:11, 24 21:2 30:5 48:21 <b>works</b> 60:6,10 84:21 <b>wounded</b> 28:22 29:4 30:2,8,21,25 31:5,7,20 32:4,18,22, 24 33:13 35:12,18,23 40:3,11,15, 17,20 42:13, 15,21 43:11 47:11 48:17, 21,24 49:5, 13 51:25 52:4,20 54:5 57:6,12,16 58:12 59:10, 12,17,23 60:9 61:22 62:21,23 63:8,17,20 64:18 65:14 67:10,20 68:16 72:5 73:7,12 75:5 76:4,14,25 78:6 82:4	86:9 87:20 88:16 89:6 <b>wounds</b> 63:19 <b>wrap</b> 90:24 <b>written</b> 48:8 76:11 77:8,9 81:15,16 84:9 94:6, 14,23 96:3 <b>wrote</b> 77:15 83:9, 25 88:6 <hr/> <b>Y</b> <hr/> <b>Yeah</b> 46:18 48:7 85:18 <b>year</b> 63:16 65:14, 18,21,22 <b>yearly</b> 67:21 <b>years</b> 13:24 19:21 21:4,5 <b>years'</b> 63:19 <b>York</b> 4:19 6:13 7:6
<b>Wainaina</b> 4:16 <b>wait</b> 9:3,5 <b>waiting</b> 45:24 <b>waive</b> 5:17 <b>want</b> 7:20 51:6 55:21 <b>war</b> 90:3 <b>water</b> 16:4,25 18:8,11 <b>way</b> 46:13,21 89:18 <b>weeks</b> 48:9 <b>West</b> 31:18 84:6 <b>western</b> 31:10,14 <b>wife</b> 79:24 91:21 <b>withdraw</b> 26:25 29:22 <b>withdrawn</b> 51:15 81:23 <b>witness</b> 6:10 7:4 30:12 54:16 57:21 58:21 85:11 <b>witnessing</b> 69:12 <b>word</b> 85:22 <b>words</b> 85:22 <b>work</b>		